

1

2

3

4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

8

9

10

11 INTERVIEW OF: MICHAEL REED

12

13

14

15 Wednesday, July 20, 2022

16

17 Washington, D.C.

18

19

20 The interview in the above matter was held via Webex, commencing at 11:02 a.m.

21 Present: Representative Lofgren.

1        Appearances:

2

3

4        For the SELECT COMMITTEE TO INVESTIGATE

5        THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

6        [REDACTED] INVESTIGATIVE COUNSEL

7        [REDACTED] STAFF ASSOCIATE

8        [REDACTED] PROFESSIONAL STAFF MEMBER

9        [REDACTED] FINANCIAL INVESTIGATOR

10        [REDACTED] FINANCIAL INVESTIGATOR

11        [REDACTED] SENIOR INVESTIGATIVE COUNSEL

12

13

14        For MICHAEL REED:

15

16        TODD STEGGERDA

17        EMILY ERB KELLEY

18        MCGUIREWOODS

19        WASHINGTON, D.C.

20

21

22

23

24

25

1 [REDACTED] This is a transcribed interview of Michael Reed conducted  
2 by the House Select Committee to Investigate the January 6th Attack on the U.S. Capitol  
3 pursuant to House Resolution 503.

4 At this time, I'd ask the witness to please state your full name and spell your last  
5 name for the record

6                   Mr. Reed. My name is Michael Joseph Reed. Spelling of the last name is  
7                   R-e-e-d

8 [REDACTED] Mr. Reed, this will be a staff-led interview, although  
9 members may choose to ask questions.

10 I will note that Ms. Lofgren is joining us today on the Webex.

11 My name is [REDACTED] and I'm an investigative counsel with the  
12 select committee. With me from the select committee staff are [REDACTED] senior  
13 investigative counsel, [REDACTED] financial investigator, and joined on the  
14 Webex by investigator [REDACTED]

15 At this time, I'm going to ask counsel to identify himself for the record, please.

16                   Mr. Steggerda. I'm Todd Steggerda. I'm a partner in the Washington, D.C.,  
17 office of McGuireWoods, representing Mr. Reed.

18 I am joined by my associate from McGuireWoods, Emily Kelley, also resident in  
19 our D.C. office.

20 [REDACTED] Mr. Reed, you are voluntarily here for this transcribed  
21 interview. I'm going to give you some ground rules.

22 There are official reporters transcribing the record of this interview. That  
23 transcription will serve as the official record of the proceeding.

24 This proceeding is also audio and video recorded. We ask that you and your  
25 counsel do not audio or video record the proceeding

1 Please wait until each question is completed before you begin to respond, and we  
2 will do our best to wait until your response is complete before we ask the next question.

3                   The reporter cannot note nonverbal responses, such as shaking or nodding your  
4                   head. So it's important that you respond to each question with an audible verbal  
5                   response.

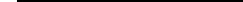
6 Please give answers to the best of your recollection. If a question is unclear,  
7 please ask for clarification. If you don't know the answer, please just say so.

8 I'm also going to remind you that it's unlawful to deliberately provide false  
9 information to Congress, and doing so can result in criminal penalties.

10 At any time, if you want any breaks for any reason, whether just a comfort break  
11 or to speak with your lawyer, please let us know. We're happy to accommodate.

12 Do you have any questions before we begin?

13                   Mr. Reed.   No.

14  All right.

15 EXAMINATION

16 BY [REDACTED]

17 Q Mr. Reed, can you please provide us with your date of birth?

18 A

19 Q And where do you reside?

20 A Washington, D.C.

21 Q And what is your cell phone number?

22 A 

23 Q And was that the number you had in November 2020 through January '21?

24 A Yes.

25 Q And do you have any other cell phones besides that number?

1 A No.

2 Q What about email addresses that you used from November 2020 through  
3 January '21?

4 A My work email. Do you want the actual addresses?

5 Q Yes, please.

6 A My work email is mreed@gop.com -- or dot-org. Gosh. Sorry. And my  
7 Gmail is Reed, [REDACTED] And I don't think I have any other email  
8 addresses.

9 Q And did you conduct any RNC work through your Gmail?

10 A Never purposefully, I don't believe, no. There may have been times when  
11 sometimes a Gmail would get accidentally added to a chain or something to that effect.  
12 But, no, I try and conduct all of my work on my work email.

13 Q And what about social media accounts? Instagram? Twitter?

14 A Yes. I have a Twitter and an Instagram account. I think the handles for  
15 both are Reed1311.

16 Q Okay. Can you tell us a bit about your educational background?

17 A Yes. I went to -- graduated undergraduate college at Hobart College in  
18 Geneva, New York.

19 Q And when did you graduate?

20 A 2006.

21 Q All right. Now, we've taken a look at your public LinkedIn page.  
22 Is it fair to say that what everything is on there is a fair and accurate description of  
23 your background?

24 A Yes, I believe so.

25 Q All right. So we're going to jump ahead to your time at the RNC, and it

1       notes that you joined the RNC in January 2017 as research director and deputy  
2       communications director. Is that right?

3           A    Yes, that's correct. January, February 2017.

4           Q    And what did you do in that role?

5           A    I essentially was the research director at the RNC for 2017 and 2018,  
6        responsibilities of the research department. I also had a foot in comms helping assist  
7        the communications department. It's really one operation.

8           But the role of the research director at the RNC is essentially to run a team to  
9        assist the communication team, and fact-checking various public communications that go  
10       out from the communications team, oftentimes dealing with the press directly, trying to  
11       shape stories with facts and figures or putting research out publicly, working with the  
12       regional communications team, the chairman's office, other departments, to make sure  
13       their speeches or public communications are accurate and have the information they  
14       need.

15           Q    And then you became the deputy chief of staff for communications in  
16        February of 2019. Is that correct?

17           A    Yes, that's correct.

18           Q    And you stayed in that role until February of 2021?

19           A    Correct.

20           Q    Can you tell us a bit about what your roles and responsibilities were in that  
21        position?

22           A    Yes. So that was just more of an oversight role over both the entire  
23        research and communications operation. I had someone backfill my role and become  
24        research director behind me. So I helped oversee him and the research department, as  
25        well as very much having a hand in the communications team to help them oversee that

1 operation, and reporting to the chairman's office on behalf of research and  
2 communications.

3 Q So who did you directly report to in your role as deputy chief of staff for  
4 communications?

5 A The chief of staff and the chairwoman, I would say.

6 Q So was that -- in, let's say, 2020 through January '21, was that Richard  
7 Walters and Ronna McDaniel?

8 A Yes.

9 Q All right. I want to move forward to the 2020 cycle, and I'll give you a brief  
10 overview. We're going to talk a good bit today, Mr. Reed, about what role, if any, you  
11 had with the review of fundraising emails and TMAGAC's fundraising efforts with the  
12 Trump campaign.

13 So you're familiar with TMAGAC, correct, the joint fundraising committee between  
14 the RNC and the Trump campaign?

15 A Yes.

16 Q And did you have a role with regard to the fundraising emails that were  
17 disseminated from TMAGAC?

18 A I had a role in approving them, yes.

19 Q When did you first get involved with approving those emails?

20 A I don't remember what month it was, but I would say just generally speaking  
21 likely when the JF -- likely when the -- best of my recollection, when the JFC started, I  
22 would have been the research -- serve mostly as the research sign-off whenever the  
23 JFC was -- whenever they started being sent on for approval.

24 Q So before we get into that, let's just quickly go over our understanding of  
25 how -- the RNC's role with the TMAGAC fundraising.

1           Our understanding in our investigation thus far is that RNC copywriters  
2       served -- were the primary authors of the fundraising copy that went out of TMAGAC on a  
3       team led by Austin Boedigheimer.

4           Was that your understanding for the 2020 cycle?

5           A    Generally, yeah. I'm not sure who wrote all of them. I think that tracks  
6       generally with my understanding, though, that, yes, I believe that it was RNC digital  
7       staffers, I'm not sure exactly who, that would come up with some or if not all of that copy.  
8       I'm not sure how much of it, but certainly it generally tracks with my understanding, yes.

9           Q    And was it your understanding that after they drafted that copy it would be  
10       reviewed by Austin Boedigheimer?

11          A    I actually don't know the review process purely on the digital side.

12          Q    So what was your understanding -- and we'll get into your role in the  
13       approval process -- but what was your understanding as to how copy got from the RNC  
14       copywriters into the approval process for when you would see it?

15          A    Yeah. So just generally, my understanding of how that team puts these  
16       emails, digital emails, fundraising emails together, it would typically be them taking  
17       something, the messaging that's coming from the campaign or the RNC or the President  
18       at the time, and taking that message, putting it in some -- putting the copy together in a  
19       fundraising email. And then it would be sent around for approval to several members of  
20       the RNC as well as, if we're talking about the JFC, as well as to the campaign.

21          Q    Now, our understanding through our investigation thus far is that the  
22       copywriters sought to capture the voice and tone of President Trump in its messaging.

23           Was that your understanding, that that was accurate?

24          A    Yeah, that generally tracks with -- I wouldn't dispute that. That tracks with  
25       my understanding as well.

1           Q     And was it your understanding that the copywriters would also necessarily  
2 follow the messaging of President Trump?

3           Meaning, if President Trump was focused on a particular issue, that in their role  
4 they would also tend to focus on similar issues that he was speaking to his supporters  
5 about?

6           A     Yeah. That's my understanding.

7           Q     Now, going into the election, we're going to talk substantially, Mr. Reed,  
8 about the kind of post-election fraud claims that were present in the fundraising emails  
9 that went out from TMAGAC and your role in approving those. But I want to kind of up  
10 back a little bit in your role as deputy chief of staff.

11           In the lead-up to the 2020 election, did you have discussions internal to the RNC  
12 about how the RNC would deal with the potential for fraud in the 2020 election from a  
13 comms messaging point?

14           A     I'm sure we did. I couldn't remember specifically when or what those  
15 conversations were, but I'm sure we did have conversations. I know we did from a legal  
16 perspective have conversations about how we were going to handle the flood of ballots  
17 coming in and making sure everything was handled properly and if we needed to litigate,  
18 if the legal team thought that there were issues places.

19           But I don't remember specifics about when or drill down more than that. But I'm  
20 sure we did discuss it, yes.

21           Q     In 2020, were you ever in -- how often did you meet with the chairman -- or  
22 the chairwoman, I should say?

23           A     I would say fairly often. She doesn't live in D.C., so if she wasn't in D.C.  
24 we'd talk on the phone multiple times a week. And if she was in D.C., I would typically  
25 meet with her, especially if she had a media hit. I would typically staff her for that.

1           Q     In 2020, did she ever have any discussions with you about any meetings she  
2     had with President Trump?

3           A     Yeah. I'm sure we would -- yeah, we would discuss them from time to  
4     time. Yes.

5           Q     How often would you have these discussions?

6           A     It would be hard for me to say right now, I'm sorry, to put a number on it.  
7     Obviously, she would talk more with her chief of staff with those. But I've been a close  
8     adviser for her for a long time, so they'd certainly come up from time to time. We have  
9     each other's confidence, so --

10          Q     And did she ever have discussions with you about President Trump's view of  
11     the 2020 election pre-election?

12          A     Again, I'm sure -- yeah, I'm sure we did. Well, could you repeat the  
13     question actually?

14          Q     Did you have any discussions with Ms. McDaniel about -- or did she ever  
15     reflect to you her conversations that she had with President Trump about the lead-up to  
16     the 2020 election in any way?

17          A     Oh, just generally about -- yeah. You mean, how the election was going to  
18     be conducted? I mean, yeah, we were very concerned at the time about laws being  
19     changed in the name of COVID. I'm sure that -- I can't recall specifics, but I'm fairly  
20     certain that she would talk to the President about that. Now, I may have spoken to her  
21     about those conversations at various points, but, again, I can't remember specifics.

22          Q     Did she ever talk to you about a conversation that -- about any conversations  
23     in which President Trump asserted that he would claim victory in the 2020 election even  
24     if he lost?

25          A     I don't remember anything specifically on that. I'm sorry.

1           Q     Did you, yourself, have any meetings where the President attended?

2           A     Yes, one specifically in my mind that I remember. There could -- yeah.

3     Actually, I'm trying to remember on the spot. I'm sorry.

4           Yeah, there's one that comes to mind. I don't remember exact timing. I think it  
5     was early summer of 2020 where we brought the communications team from the  
6     campaign, as well as the RNC, together to the White House to just do a quick summit with  
7     him.

8           And then I would sometimes be in the room with him at finance event donor  
9     retreats, where we would do a small roundtable. And then, obviously, I was there for  
10    various speeches in larger rooms from time to time.

11           So that's what I can recall right now about times I've been in -- I was in meetings  
12    with him.

13           Q     And with the comms meeting you talked about with the comms teams, I  
14    assume that was a pretty large meeting? Was that an intimate meeting?

15           A     Yeah. There were about 20, 30 people there.

16           Q     Okay. And the roundtables, were those intimate meetings -- or those were  
17    with donors you were saying?

18           A     Correct. Those were with donors. I'd say those were a little smaller.  
19    They ranged from 8 to 20. That's a guess, but generally in that range.

20           Q     I want to turn back to your approvals.

21           When did you start approving emails from TMAGAC?

22           A     I'm sorry. I don't remember what month that started. I'm assuming that I  
23    started approving them whenever the JFC began, but I don't remember when that was.

24           Q     So is it fair to say you did this for the duration of the 2020 cycle, meaning  
25    post-midterms through election day and out?

1           A    Yeah. I think to the best of my recollection that's fair to say, yes.

2           Q    And what did you see your role as on the approvals chain?

3           A    I was -- I served mostly, best of my recollection, as the research sign-off. So  
4    if I saw something in the emails that was easily verifiable -- typically it was something like  
5    a fact or figure -- I'd give like -- I guess I can give an example.

6           Like if an email came through and said -- a fundraising email said the average price  
7    of gas is \$1.50, but it was actually \$4.00, that's something you can easily look up on a  
8    website, GasBuddy or whatever it is online. I would correct that sort of thing and say,  
9    well, actually this number is incorrect or something like that. That's the way I could  
10   describe how I would look at these and what my role was then.

11           Q    Were you only checking kind of facts and figures, or were you also checking  
12    broader comms messaging, things of that nature?

13           A    I would say as the research sign-off, I was mostly focused on facts and  
14    figures. But if I saw something on the messaging -- we would have someone -- I think  
15    we -- if I remember correctly, we had two sign-offs from the research and comms  
16    department. I sort of -- I was the research -- typically served more as the research  
17    sign-off, and then someone else would be the comms sign-off.

18           Sometimes, I can't remember exactly, but maybe sometimes I would serve as both  
19    and just say okay for comms and research. If I saw something on the messaging side, I  
20    might pipe in. But I don't remember specifically how often that was or whatnot.

21           Q    Walk us through -- and I'm really going to be focused on summer of 2020  
22    through January 6th -- who were the sign-offs from the RNC side? Can you tell us their  
23    names and what they were signing off for?

24           A    Sure.

25           Q    And if that changes by the time we get to January 6th, if you could just note

1 the changes.

2 A Again, this is the best of my recollection, this is a year and a half or 2 years  
3 ago, so it's a little bit hard for me to remember.

4 But, generally, I think I was mostly the research sign-off. I think if I was out of  
5 pocket then, best of my recollection, sometimes the research director who backfilled me  
6 at the 2020 cycle would, I believe, sign off.

7 And then there would be someone from comms typically would sign off. I  
8 believe it would be Cassie. Her name at the time was Smedile. I think I'm saying that  
9 correctly. Now it's Docksey. Or Michael Ahrens, who was my colleague at the comms  
10 director.

11 I don't remember if there were others. There could have been. But those are  
12 the ones that mostly come to mind for me.

13 Q Was there a legal sign-off?

14 A I believe there was, yes.

15 Q And who was that?

16 A I don't -- I really don't remember. Some departments do it where the head  
17 will sign, the director will sign off, which obviously Justin Riemer was our lawyer then.  
18 Sometimes two departments will delegate it to -- I think he delegated it to someone else.  
19 I really honestly can't -- I can't remember specifically. He may or may not have  
20 delegated it. Might have done it himself. I don't remember. Or it may have been a  
21 combination.

22 Q In reviewing some emails, it looks like Jenna Kirsch often signed off, as well  
23 as Justin Riemer. Does that sound right to you?

24 A Yeah, that rings a bell. Thank you. That very well could be right.

25 Q Now, did you understand that for an email to go out, the RNC and the Trump

1 campaign had to sign off?

2 A That's my understanding, yes.

3 Q And who did you understand to be -- did you understand that the Trump  
4 campaign also had a similar research/comms/legal sign-off procedure?

5 A Yeah. That's my understanding.

6 Q And looking forward to election day and after, is it your recollection that  
7 Alex Cannon served as legal sign-off for the campaign?

8 A It rings a bell, yes.

9 Q And what about the name Zach Parkinson from research? Does that sound  
10 like -- is that who you recall signing off for the campaign research team?

11 A Yes, I do recall that.

12 Q And was it your understanding, generally, that they were engaged in the  
13 same general tracks that you were doing on the RNC side, but just from the campaign  
14 perspective?

15 A I, obviously, can't speak to their process, but generally speaking I would  
16 assume that's the case, yeah.

17 Q And on the comms side, did you understand someone besides Zach  
18 Parkinson to be working on the comms side in addition to research, or what was your  
19 understanding there?

20 A I don't remember. I do remember Zach replying his approval on some of  
21 them. I don't remember if there was a comms person who would also jump in from the  
22 campaign. I just -- I can't recall. Maybe, if you know, you could refresh my memory,  
23 but I don't remember.

24 [REDACTED] If somebody said that Mr. Parkinson served as both research and  
25 comms, would that sound consistent or inconsistent to you?

1                   Mr. Reed. That very well could be consistent. It wouldn't surprise me if that  
2                   was the case.

3 All right. So I'd like to move forward to election day.

4 [REDACTED] Actually, apologies, really quickly on that.

5 BY [REDACTED]

6 Q Can you describe, to the extent that you had communications with it, was it  
7 a wholly separate process from the sense of did you ever talk with the research or  
8 communication side -- I guess it would have been Mr. Parkinson -- if there were issues?

9                   Did the Trump campaign and the RNC, did the two teams talk to each other, or  
10                  was it an exclusive RNC approval process, Trump campaign approval process?

11                   A     I don't remember having any specific conversations, like, with Zach about  
12     that.  It may have happened.  But maybe the lawyers would talk.  I couldn't speak to  
13     that.

14 So it's certainly possible that there was a conversation back and forth about it, but  
15 I don't remember specifically on it, if it happened or over what.

16 Q And so understanding that the lawyers may have had conversations -- and  
17 we'll carve those out -- from your best recollection, you don't remember your side of the  
18 shop having conversations with their side of the shop?

19 A I'm not disputing that it happened. It may have. I just don't remember  
20 specifically a time that it did. But it might have.

21 Q And that's fair. I want to make sure you know we're just asking for your  
22 best recollection. So if you say, "I don't recall it happened," we don't think you're saying  
23 it didn't happen at all.

24 Just all we're asking is, do you remember a time where your research side ever  
25 communicated with the Trump research side with regard to an approval issue?

1           A    I don't remember a specific instance, no.

2           Mr. Steggerda. Yeah. And more generally, I think that's a good question. Just  
3    in terms of the process, if I could just add a question just to help us clarify.

4           I think part of what she's trying to understand is on -- with all -- we're going to get  
5    to these sign-offs and these emails, but was it normal for you to work in conjunction,  
6    hand in hand, with your research guy from the campaign and you guys decide together?  
7    Or was this just kind of --

8           Mr. Reed. No, I think --

9           Mr. Steggerda. -- you just basically --

10          Mr. Reed. Right --

11          Mr. Steggerda. -- the RNC --

12          Mr. Reed. Yeah --

13          Mr. Steggerda. -- signed off or didn't sign off on their own?

14          Mr. Reed. Yeah. We wouldn't -- I wouldn't -- I think it's typical -- I think it's fair  
15    to say I typically wouldn't back channel with Zach about it. If I had an issue, I would  
16    reply all. And I believe he saw, would see that. I remember seeing his name  
17    sometimes when he replied all and same for him. So I think that's typically how he  
18    would make edits if I remember correctly.

19           ██████████ That's very helpful. Thanks, Todd. Appreciate it.

20           ██████████ And, Mr. Reed, on that point, something we endeavor to  
21    understand here is the TMAGAC messaging.

22           The messaging coming out of TMAGAC, is that really is where the Trump campaign  
23    starts and where the RNC ends as far as controlling and driving that messaging?

24           Obviously, as we discussed, there are RNC copywriters drafting the messaging, but  
25    often with the President's tone or the President as the so-called surrogate.

1           What was your understanding as to the RNC's comms role in driving that  
2 messaging or otherwise influencing the messaging coming out of TMAGAC?

3           Did you see that as really this is driven by the Trump campaign and Trump's  
4 messaging and that's what we're endeavoring here to do?

5           Or was it best to say this is a joint enterprise where really the RNC's voice needed  
6 to be present and consistent with the RNC's own voice as well?

7           Mr. Reed. I would say the messaging, my recollection, the messaging would  
8 typically track more with the campaign.

9           You know, the way the RNC works in a Presidential cycle, we're sort of the support  
10 arm of the White House and the campaign. So typically, I would say that the messaging  
11 would take the lead from the President or the campaign.

12           But if there was an issue on the RNC side of something that was going out, I mean,  
13 it was a joint fundraising committee, so we would have, if there was a real issue or  
14 concern, we would have spoken up. Likely we would have spoken up.

15           [REDACTED]

16           Q     Let me ask just a point of clarification there, because there were emails that  
17 were coming out at the time that were either, I believe, from the RNC, like if you went to  
18 the bottom and you looked at the disclaimers, there were emails that were coming out  
19 from the RNC that were separate from the TMAGAC emails.

20           Is it fair to say that for the RNC emails that were coming out from the RNC that  
21 communications messaging was handled by the RNC communications shop with no input  
22 from the campaign, right?

23           A     Yeah, that makes sense to me, yes.

24           Q     And if it was an email from TMAGAC that purported to be from Ms.  
25 McDaniel -- who I believe was the primary representative of the RNC in the emails. I

1 can't -- sitting here, I can't remember another surrogate, so I'm just going to use Ms.  
2 McDaniel as an example.

3 But presumably, if the email purported to be from Ms. McDaniel as the head of  
4 the RNC, comms at the RNC would have strong feelings about what TMAGAC was putting  
5 out in her voice, correct?

6 A I think that's fair to say. Yes.

7 Q And so in terms of TMAGAC emails that do not purport to be from the RNC,  
8 that purported to be from the President himself or surrogates of the President, like his  
9 children or other interested parties, would you say that the RNC's comms department  
10 had the same interest or was it more, to my colleague's point, those were really driven by  
11 the campaign's comms department in terms of the content?

12 A Yeah. I understand the question. I mean, I guess it's a little of both. I  
13 mean, obviously, if something is going out, a quote from the chairwoman or something is  
14 going out in the chairwoman's name, we would obviously pay very close attention to that.

15 But we also would still -- look, it's still a JFC. So it's still at least partially an RNC  
16 fundraising sent. So we would still certainly check the emails that were going out from  
17 the JFC.

18 But, yeah, I guess to your point, it's fair to say in certain instances we might take a  
19 closer look at a quote from the chairwoman than something else. I guess that's a fair  
20 point.

21 Q Well, and let me be clear, I'm not saying that there was a -- the look -- like,  
22 I'm assuming you're reviewing them, right, because they're coming to you through the  
23 approvals process.

24 I guess what we're more trying to gauge is obviously the tone of the emails that  
25 came from Ms. McDaniel tried to simulate her voice, whereas the tone of the emails that

1        purported to be from the President or his surrogates tended to be in their voices. And  
2        those voices were different, right?

3                So to the extent that what my colleague said earlier, if an email that came  
4        from -- that purported to come from President Trump or one of his surrogates made a  
5        statement or took a stand or had a tone that was different or stronger, not  
6        necessarily -- we're not getting to the accuracy just yet, but in terms of like tone or  
7        communication strategy, if it was different than what the RNC was putting out for itself or  
8        Ms. McDaniel, how strong was the weigh-in from the RNC comms folks on those emails?

9                A        It's hard -- yeah, I understand your question. I guess it's just hard for me to  
10        give an answer without, like, specifically looking at an instance.

11                You know, if we had an issue, I believe we would have flagged it. That's kind of  
12        the best -- I'm sorry, that's kind of the best way I could answer it. We certainly checked  
13        them all.

14                It's fair to say that we may have looked closer at an email from the chairwoman,  
15        like you said, as a surrogate of the President or one of his children or whatever.

16                But I don't know how to answer, sorry, clearer than that. I mean, we still would  
17        have checked it. But, yes, certainly the messaging may have been different because it's  
18        a different surrogate. That's, of course, typical across all digital fundraising.

19                Q        So a moment ago you said sitting here right now it's hard to generally answer  
20        if there would have been issues that you would have flagged.

21                Sitting here right now, can you actually remember any issues that you flagged with  
22        their communications department about those emails?

23                A        I can't remember a specific instance. I very well might have. But, again,  
24        this is a year and a half ago. I might have provided edits here and there. I just -- I don't  
25        remember. Sorry.

1 Q Okay.

2 BY [REDACTED]

3 Q And typically when you provided edits you would reply all to the chain. Is  
4 that right?

5 A I think I typically would reply all. If there was some reason I wouldn't,  
6 maybe I would one-off it to somebody. But I typically would reply all, I think.

7 Q And is it fair to say that you typically did not have edits to TMAGAC emails?

8 A I don't remember. I'm not sure. I might have had some edits here and  
9 there. I don't remember.

10 Q Well, I'm not asking whether you ever had edits. But is it fair to say that it  
11 wasn't the norm that emails came and then you provided edits to those emails. Is that  
12 fair?

13 A I think it's fair to say that oftentimes when they're sent through for approval  
14 it's, you know, once, kind of one message is set. You may have 15 more that are very  
15 similar. And so, yes, if that was the case, I would scan through them. If it all tracks  
16 with previously approved messaging, I would hit okay. Sure.

17 Q I want to go closer to the 2020 election, just prior to the election.

18 From our -- if I recall correctly, President Trump at that time had been publicly  
19 speaking about the potential for fraud in the 2020 election, and that was kind of a theme  
20 of public conversation. Is that your recollection as well?

21 A Yeah. Yes.

22 Q Leading into the 2020 election, so our investigation has revealed, I guess -- I  
23 mean, I don't want to use a word that suggests anything sketchy, but we understand  
24 that --

25 [REDACTED] Uncovered?

1 [REDACTED] Yeah. Uncovered. That doesn't sound suspicious.

2 [REDACTED] Less dramatic.

3 BY [REDACTED]

4 Q But our understanding, Mr. Reed, is that the RNC in the lead-up to the 2020  
5 election had approved certain fundraising emails that were ready to go post-election day  
6 on some topics, but not others.

7 Specifically, that the theme of trying to steal, which, as I'm sure you're aware,  
8 there are emails that talk about Democrats trying to steal the election. Are you familiar  
9 with those emails or that theme of emails?

10 A Yeah. Yes. Generally familiar with the emails, yes.

11 Q So our understanding is that Mr. Boedigheimer had received approval for  
12 emails dealing with "trying to steal" messaging going into the 2020 election. So by  
13 election day, certain emails were approved on that theme, but emails were not  
14 approved -- there was not yet approval given for victory emails or emails regarding that  
15 the election results might be undecided, let's say, kind of in suspense.

16 Do you have a recollection of leading up to election day what approvals were  
17 granted regarding emails to be sent post-election day?

18 A I don't have a specific recollection of that, no. But it wouldn't surprise me.  
19 But I don't have a recollection of that.

20 Q So you say it would not surprise you that there had been approvals given  
21 specifically for the "trying to steal" messaging to be sent after election day?

22 A I only say it wouldn't surprise me because obviously I've been in politics a  
23 long time, and if a race is close -- it wouldn't surprise me because if a race is close, you  
24 typically have plans in place, whether it be fundraising or legal or communications or  
25 whatever, of the days post-election day, E plus one, two, three, how we talk about it.

1           And so if a race is close and there could be ballots coming in after a deadline or  
2   ballots without the proper safeguards on them, we would have -- typically, in politics  
3   you'd have a plan in place of how to message to make sure the lawyers have the correct  
4   strategy and communications has the correct strategy to make sure that we have plans in  
5   place to message on and have the legal team potentially file lawsuits or challenge  
6   potentially illegal things that are happening in a very close race, whether it be leading to a  
7   recount or any of those matters.

8           Q    Is it fair to say that the TMAGAC emails that went out to millions of people  
9   on a daily basis, that that was part of the kind of campaign messaging apparatus as well.  
10   Is that fair?

11          A    Sorry. Repeat the question.

12          Q    Is it fair to say that the TMAGAC emails were part of the RNC and the  
13   campaign's messaging apparatus? Meaning, they're delivering campaign messaging,  
14   talking points effectively to millions of people on a daily basis. Is that a fair  
15   characterization of the emails?

16          A    I'm actually not sure that's a fair statement. I don't really see digital  
17   fundraising emails as like the lead on messaging. Oftentimes those are kind of what  
18   follows what you're publicly communicating. I'm not sure I would say that's a fair  
19   statement. I don't see it strategically that way, that digital fundraising would be the lead  
20   messaging on matters like that.

21           ██████████ What would you say is the lead on messaging?

22          Mr. Reed. Obviously, like a principal, like the President or the chairwoman or top  
23   surrogates, top communications people, messages that go out on Twitter, press releases,  
24   speeches, that's more of what I think of.

25           I can't think of too many scenarios, just not talking about this period but just in my

1 career, where we had -- you would just put up something, a digital fundraising product  
2 like an email, to donors and that would be the lead of the messaging.

3 BY [REDACTED]

4 Q And, Mr. Reed, I wasn't trying to suggest it was the lead, but that it was part  
5 of the messaging. I use the term apparatus, but not so much the lead. But it sounds  
6 like you were saying fundraising emails are going to be consistent with the  
7 candidate's messaging --

8 A Well, yeah, I concede that, yes, because fundraising emails track with the  
9 public messaging. I concede that point, yes.

10 Q So when individuals are receiving those emails, they are in fact receiving  
11 campaign comms messaging in those emails, hence why folks like you were involved and  
12 the comms teams of the campaign --

13 A Yes. Yes.

14 Q Okay.

15 A Fair to say, yes.

16 Q All right. And you talked about it would be normal to prepare. So when I  
17 say that -- or proffer to you that Austin Boedigheimer indicated in documents that there  
18 were "trying to steal" messaging had been approved, your understanding is that that  
19 would be normal and typical and that doesn't surprise you to hear. Is that fair?

20 A Yeah. I think it's fair to say it, generally speaking, wouldn't surprise me that  
21 the digital team, the comms team, and the legal team on a campaign would have  
22 messaging and plans in place based off of various scenarios that could transpire on  
23 election night.

24 Q And so I want to now hone in specifically on the "trying to steal" scenario.

25 Leading into election day, did you have conversations internally at the RNC about

1      Democrats trying to steal, which is the wording Mr. Boedigheimer uses?   Did you have  
2      discussions about messaging that post-election?

3            A      I don't remember specifically, but I'm sure we did.   I mean, there were  
4      many concerns at the time about how the election was being conducted.   I think  
5      everyone was talking about the potential for a very close race in several States and having  
6      a scenario where it's kind of mayhem in the counting process in some of these States on  
7      election day and post-election day.   So I'm sure conversations like that took place.

8            Q      And is it fair to say that when the term "trying to steal" the election is used,  
9      we're talking about election fraud?   Is that fair?

10           A      To say -- yeah.   The phrase "Democrats trying to steal the election," I think  
11      it's fair to say, yeah, there we would be referring to, yeah, Democrats, there being fraud  
12      or counting of illegal ballots or not following the proper processes in counting or recounts  
13      or whatever it may be.   That's generally what we'd be referring to, I believe.

14           Q      So going to election day, you don't recall any specific kind of strategy of how  
15      to handle various potential post-election outcomes.   Is that what you're saying?

16           A      I'm saying I'm sure we talked about it.   I'm just not saying -- I can't  
17      remember specifically when or those specific conversations.   But I'm sure we talked  
18      about strategy around these issues prior to election day.

19           Q      So let's go to election day.   Election day comes.   There's voting.   Election  
20      evening comes.   No winner is declared.

21                Going into election day, there was lots of discussion about a potential red mirage  
22      and then the late blue wave, I believe it was called.

23                Are you familiar with those concepts?

24            A      I'm familiar with the concepts, yes.

25            Q      All right.   So is it fair to say that there was a lot of public discussion about

1 the potential that President Trump may be ahead on election day but that Joe Biden  
2 may -- could catch up because some more left-leading votes may be counted later? Is  
3 that a fair characterization of one perspective?

4 A Yeah, I remember hearing those arguments.

5 Q And was that your expectation as well, that election night there wouldn't be  
6 a -- there would likely not be a winner called election night because of the role of mail-in  
7 ballots and whatnot?

8 A I think that's fair to say. Although I would say it varied by -- I remember it  
9 very much varied by State, because some States would be allowed to count mail-in ballots  
10 that were arriving prior to election day and report those totals earlier, if I remember  
11 correctly, and then other States -- which is insane in my mind -- didn't start counting  
12 mail-in ballots, I believe, till like election day or even after election day.

13 So I remember it varying by State. And I remember there being confusion about  
14 it and not -- maybe we would generally be where I just said, but maybe not have an -- we  
15 maybe wouldn't have accurate counts on election night of what ballots were in or were  
16 part of the tabulation process that were being counted, whether they were election day  
17 votes or mail-in votes that arrived before election day, and there being confusion about  
18 how many votes may be left outstanding to be counted.

19 So that generally tracks with my understanding. But again, it varied by State. I  
20 remember there certainly being some confusion.

21 BY [REDACTED]

22 Q So a moment ago when we were talking about kind of the nature  
23 of -- because I think it's important to use a couple of terms or kind of define a couple of  
24 terms just so we're being clear. A moment ago when we were talking about -- my  
25 colleague said something along the lines of election fraud, which suggested intent.

1           I think you used the words an intent to count illegal ballots or something nefarious  
2        where the intent is to have votes counted that shouldn't be or hide votes, all the stories  
3        of suitcases full of ballots or ballots from dumpsters, right, things that we traditionally  
4        think of as election fraud and intent to violate the legal system to get votes counted that  
5        shouldn't be.

6           And then there's the term that some people use, which I'll say is election integrity,  
7        where the concept is, oh, they changed the law, should the secretary of state be able to  
8        do that, should those rules work that way, did they follow the procedures correctly, et  
9        cetera.

10          Let me start with, have you ever heard those terms defined that way? In your  
11        head, is that a framework that you're familiar with as the comms person for the RNC?

12          A    Yeah. I would say in the election fraud bucket I would include all of those  
13        things, whether it be, like you said, straight up dead people voting or, like you said,  
14        suitcases full of ballots or whatever it may be. Everything from that to an election  
15        tabulator counting a ballot they shouldn't, like if a ballot didn't have a signature match  
16        and it was the law that it should; or they didn't look at a voter ID when they should have  
17        or they counted it after a certain date that they weren't allowed to.

18          I'd consider that all in the fraud bucket. Does that kind of answer your question?

19          Q    In a sense, yes, because I think even in the later examples you gave, those  
20        are people who are knowingly doing something that they shouldn't, right? An election  
21        worker who decides to count a ballot that legally shouldn't be counted, there's some  
22        intent there, right?

23          A    Right.

24          Q    When you say election fraud, I just want to make sure that we're talking  
25        about the same thing. And generally, when you're talking about election fraud or fraud

1 in general, but election fraud, there's an intent to do something wrong or illegal, an intent  
2 to have ballots counted that shouldn't be.

3 It's not necessarily the issue of, well, this secretary of state made a rule that  
4 legally they shouldn't have done. That's, I think --

5 A Yeah. I get -- I understand where you're coming from. The only thing I  
6 would add to that is that maybe -- sometimes maybe the intent wasn't there, like if a  
7 tabulator didn't know the law. I would include that in that bucket too. But generally, I  
8 don't dispute what you're saying.

9 Mr. Steggerda. But did you say earlier that the -- we've blended a little bit of the  
10 concepts -- in terms of the concept that was the original question of Dems trying to steal  
11 the election, and you rattled off a lot of things.

12 Do you include in that concept just purely intentional fraud? Or do you view it  
13 into the --

14 Mr. Reed. That's fair.

15 Mr. Steggerda. They want clarify. And when you hear those things, what's your  
16 mindset?

17 Mr. Reed. Right. So she was talking about specifically on like that fraud front,  
18 right? I would say that more generally on the phrase about stealing an election, yeah, I  
19 would include States that changed laws I think unfairly or illegally where they didn't go  
20 through the legislature or a court, unilaterally changed the law without going through the  
21 proper processes. In the name of COVID, all kinds of stuff was changed that didn't go  
22 through the proper process. That's fair to say that stuff would potentially fit in that  
23 bucket as well, yes.

24 [REDACTED] So that is an important point that I want to be clear.

25 Your position was that if a State changed the law for COVID, that that could

1 constitute election fraud?

2 Mr. Steggerda. That's not -- I don't think that's what he said.

3 But you can clarify. It's a good question.

4 Mr. Reed. Yeah, it's hard to say without like specifically looking at instances.

5 But I think I'd put that in the bucket more of like Democrats trying to steal an election and  
6 fraud maybe more the first bucket we were just talking about. But again, you're talking  
7 very general. That's kind of the best way I would describe it.

8 BY [REDACTED]

9 Q Well, it's actually really important because what we're trying to get a handle  
10 on is not how we define it, but how were you defining it, how were you looking at it.

11 For example, if a State changed a law, did you look at the law? Did you evaluate  
12 the law? Did you look at the process?

13 If it was a Republican State that changed its law to make it easier to vote for  
14 COVID, did that weigh into your consideration of whether it was election fraud? Did it  
15 matter?

16 Do you see what I'm getting at?

17 A Yeah, I do see what you're getting at. Yeah. And I would say into the  
18 lead-up to election day, if I remember correctly, the RNC was very aggressive at -- we  
19 were very concerned with how both Republicans and Democrats at the State level were  
20 supporting and pushing changes to State law in the name of COVID.

21 You know, I remember that clearly our position at the time was that voting in  
22 person is safe and that States should not be going from -- I'm throwing out general  
23 numbers here, I don't remember specifically -- but States should not be going from less  
24 than 10 percent of their electorate voting via absentee to over 90 percent.

25 We thought that was crazy and we thought that was ripe for problems and was

1 going to create all kind of chaos and headaches on election day and the days after. And  
2 I think we were right about that.

3 And our legal team -- I'm not a lawyer -- but our legal team was actively engaged  
4 in suing on these, trying to keep the election safeguards in place that we thought were  
5 important to protect the integrity of the ballot, whether it be a signature match on a  
6 mail-in ballot -- that again was massively higher, mail-in ballots were massively higher this  
7 year or in that election -- voter ID requirements, witness requirements, and absentee  
8 ballots.

9 When absentee ballots were allowed to arrive, we were having all kinds of issues  
10 with the Postal Service during COVID. We had all kinds of concerns about that stuff.

11 So that was very much part of both the lead-up to election, and those concerns  
12 persisted well after election day.

13 And so I guess I don't want to split hairs like the fraud versus Democrats steal it.  
14 I guess all of that is kind of in that bucket. That's kind of the best way I can describe it.

15 Q No, it's a very helpful description. And the reason why -- and I know it feels  
16 like splitting hairs, but to Todd's point a moment ago, we actually -- it feels like splitting  
17 hairs, but it's really because we want to make sure that we understand exactly to the best  
18 that we can what you were thinking, the evaluations that you were having.

19 And we don't want to put words in your mouth and then walk away with what we  
20 understand versus what you do, especially when, frankly, a lot of this comes from years in  
21 politics that, frankly, the people on this side of the camera do not have.

22 So I say all that to say that the reason I asked for that clarification is because -- and  
23 I'm just going to dip into my former life for a moment -- when somebody says you're  
24 trying to steal, there's an intent there. It suggests, right, if I go into a store and I put  
25 something in my cart and I accidentally walk out with it, I didn't try to steal it, right? I

1 accidentally had something in my cart and the byproduct was stealing.

2 If somebody says you tried to steal something, it's because I put it in my pocket  
3 with the intent to steal it because there was an intent to steal.

4 So the reason I am asking these questions is because when you say the Democrats  
5 are trying to steal the election, what I'm trying to figure out is, did you ever have any  
6 conversations about the difference between putting intent on an entire party that these  
7 laws, these practices, changing to mail-in balloting versus in-person voting, came with the  
8 intent to try to steal the election?

9 That is different than saying there's an irresponsibility to changing these laws that  
10 may open the door to fraud that might happen, which doesn't actually impart intent on  
11 the Democratic Party.

12 If a Republican legislature changed its laws for COVID, were you also saying that  
13 that Republican State intended to try to steal the election by changing their laws?

14 That's what I'm trying to get at, is was there any conversation as a comms  
15 department about the relevance of using the term "trying to steal the election," which  
16 imparts intent?

17 A So I don't remember a specific conversation, but what I would say is that it's  
18 both, right? And I can't get to the motive. I can't sitting here today, obviously, define  
19 someone's motives.

20 But I would say that we thought it was both at the time, right? We thought that  
21 there were maybe some elected officials who were changing laws because they thought it  
22 gave them a leg up to throw these laws that were on the books out to win the election  
23 and there are others that maybe weren't thinking that, but that was the byproduct of it.

24 So I think it's all of the things you described. But I don't remember a specific  
25 conversation of it, but that was, I think, our general mindset going into election day.

1           Q     And to be clear, I don't want to ask you about conversations that legal may  
2 have had or that you had with legal regarding legal advice.

3           I'm trying to get at the conversations that you might have had as a comms  
4 department about the messaging of Democrats are trying to steal the election or  
5 Democrats are stealing the election versus this increases the possibility of fraud, which is  
6 different.

7           A     Yeah. I don't remember a specific conversation of that. But if an election  
8 is going to be close and we have a lot of concerns about the way it was conducted, I  
9 wouldn't be surprised. This is pretty common language in politics, to talk about how  
10 when a race is really close and potential recount territory or very close territory and laws  
11 have been changed going into it, we think unfairly or improperly, that we would use  
12 language like the other side is trying to steal it. Democrats have done that.  
13 Republicans have done that.

14           Mr. Steggerda. Mike, so when do you remember the first time that you heard  
15 the concept of Dems trying to steal an election?

16           Mr. Reed. I don't remember --

17           Mr. Steggerda. Is that a creation of this 2020 Presidential, or does it go back --

18           Mr. Reed. No.

19           Mr. Steggerda. What did you think when you saw that?

20           Mr. Reed. Right. So definitely that language -- I couldn't say specifically, but I  
21 feel like I remember that language certainly being used in elections past. And I think it  
22 certainly came back in this election when we first started hearing it again when we saw  
23 COVID hit and laws started to be changed.

24           ██████████ And I guess my question is, was it the RNC's position that any change  
25 to the law that allowed for mail-in votes would be an attempt to steal the election?

1                   Mr. Steggerda. If you know.

2                   Mr. Reed. Yeah. I don't want to speak for legal. I mean, I just remember  
3 there being a lot of concern.

4                   ██████████ Let me be clear. I'm not -- I don't want you to put the legal position  
5 of RNC. I'm talking about from a communications messaging perspective what the RNC  
6 was putting out in terms of messaging or its positions.

7                   Was it the RNC's messaging position that a change to the law to mail-in balloting  
8 was done with the intent to steal the election or to somehow illegally take those votes,  
9 that any change to the laws --

10                  Mr. Reed. Yes, that's a fair question.

11                  What I generally remember at the time -- I couldn't remember specifically -- but  
12 generally remember is that we kind of understood that, obviously, COVID had just hit and  
13 was a concerning issue, that there would be some changes. What I remember is our  
14 concern at the time was how big the changes were.

15                  You know, we knew around the edges there may be -- and I think -- I can't  
16 remember specifically, but I'm sure our legal department didn't protest every single  
17 change that occurred because I think we all recognized that some little things would have  
18 to change. But our concern was the large ones that we thought were really going to  
19 create problems, like taking away these safeguards and going from very little mail-in  
20 absentee ballots to a very high degree.

21                  ██████████ Okay.

22                  BY ██████████

23                  Q      Mr. Reed, just to put a fine point on this, we've been talking a lot about  
24 changes to voting procedures.

25                  Throughout the emails, there's talk of Democrats are trying to steal the election.

1       Was it your understanding that any of that dealt with actual intentional fraud unrelated  
2       to COVID changes -- dead people voting, fake ballots, all kind of things?

3           Was it your understanding that that was also included in the Democrats trying to  
4       steal, or was it your perspective that we're only talking about election law modifications?

5       A     I think it was both.

6       Q     Okay. So let's talk about the election fraud component, like traditional  
7       fraud, meaning not changing the laws, people trying -- knowing that they are trying to  
8       select a winner that the people did not choose.

9           Going into election day, did you have -- or what was your basis then that the  
10      Democrats were trying to steal the election in a traditional fraud manner, not regard to  
11      law modifications?

12       A     Well, beyond law modifications, I mean, I guess it kind of goes -- one goes  
13      hand in hand with the other. But one example that pops to mind would just be how, I  
14      think it was California and Nevada and I think there were a few other States, that were  
15      just mailing ballots to every single person on the voter roll. And the voter rolls, as we all  
16      know, are not up to date in these States.

17           And that was of great concern at the time, that we were finding in the lead-up to  
18      election day there were pictures posted online and our political team or whoever else  
19      was finding hundreds of ballots in trash cans, in door stoops, in condo parks, or whatever  
20      it may be.

21           And so that has obviously the potential for fraud if you have ballots laying around.  
22      So that's just one thing that pops into my head. I don't know if that answers your  
23      question or not.

24       Q     Not quite, because we're going to look at some of the emails where you're  
25      saying that -- where the RNC approves emails saying the Democrats are trying to steal the

1 election.

2           What I'm trying to focus on here is intentional fraud that would impact the  
3 outcome of the Presidential election, right?

4           Mr. Steggerda. Tem, are you, just so I understand the question, are you asking  
5 him what specific examples of intentional fraud can he accurately cite here today? Is  
6 that the question?

7           ██████████ No, it's not. It's a little broader, Todd.

8           What I want to do, Mr. Reed, we're going to look at some of these approval chains  
9 and the emails that went out. And what we're trying to parse out is what your  
10 understanding as to what the messaging going out to the American people was, right?

11           Because you're offering some more nuanced perspectives on election law in the  
12 year 2020. Obviously, that's not how fundraising emails work. These emails are  
13 simple. They are not complicated. They're not complex. They're not legal treatises,  
14 right? They say simple things, like Democrats are trying to steal the election.

15           And what we're trying to unpack here is the RNC's perspective as to what the  
16 American people were supposed to understand from reviewing the emails and getting  
17 them sometimes 20 times a day. That's what we want to understand what your thinking  
18 was when you approved these emails, right?

19           So the emails, of course, do not talk about detailed, more nuanced issues, but no  
20 fundraising emails [inaudible]. Obviously that's not how it works.

21           So going to November 4th, we see emails that say the Democrats are trying to  
22 steal the election. And what I'm trying to understand is that at that time when you  
23 signed off on those emails, was it your understanding that Democrats were trying to  
24 engage in intentional fraud of a traditional nature to impact the outcome of the election,  
25 separate from modifying election laws that also the Republicans were doing?

1 I mean, just for backdrop, there's an article here from ABC that indicates prior to  
2 the election that at least 30 States plus D.C. have made at least some changes that will  
3 make it easier and more accessible for voters to cast their ballots from home. And some  
4 of those States included Alabama, Arkansas, Iowa, Georgia, Missouri, Montana.

5 [REDACTED] Kentucky.

6 [REDACTED] Kentucky, South Carolina, West Virginia. States that are  
7 not by any means considered to be liberal States.

8 So I'm putting that as a backdrop. And I would like to hear from you parsing out  
9 November 4th, the day after the election, you're signing off on emails that say the  
10 Democrats are trying to steal the election. And what was your understanding as to the  
11 intentional fraud component from the Democratic Party to impact the outcome of the  
12 2020 Presidential election?

13 Mr. Reed. Yeah. So the concerns at the time -- again, the best I can  
14 remember -- were that all these laws were changed, we think wrongly, improperly, that  
15 allowed for a huge potential for fraud and problems with the election.

16 Does that answer your question?

1 [12:02 p.m.]

2 [REDACTED]

3 Q Not really. So -- and I don't want to make it more complicated than it is,  
4 but you're in the approval process. There's an email that comes out that's being sent  
5 the day after the election: Democrats are trying to steal the election.

6 What is your understanding of what they're trying to do to steal the election on E  
7 plus 1? What is the messaging?

8 A I can't remember, you know, specifically right now what I -- I mean, just like  
9 stuff that generally comes to mind would be, you know, absentee ballots that are still  
10 flooding in after Election Day in some States with, you know, a law change or deadline  
11 change in terms of when an absentee ballot was supposed to be received, and those  
12 ballots not having signature matches on them, potentially being piled up in trash cans or  
13 front stoops and being sent in by, you know, who knows, and a process where election  
14 administrators and counters are overwhelmed by the amount of absentee ballots coming  
15 in and checking to make sure the safeguards are there. At the same time, they're  
16 kicking out election observers so that there's no oversight -- you know, parts and  
17 oversight on the process.

18 That was -- I remember that being the concern at the time and why, in a very close  
19 race, there's great concern that the Democrats were going to try and steal the election.

20 Does that make sense?

21 BY [REDACTED]

22 Q Well, sir, the question is this: Looking at the emails, it appears that there's  
23 an inference, or a clear suggestion that there's a concerted planned effort by the  
24 Democratic Party to steal the election through fraud. All right.

25 Do you agree that in reading these emails when an email says, "The Democrats

1 are trying to steal the election" the average person would think that the Democrats are  
2 trying to steal the election through fraud, without any kind of further explanation?

3 A I think they could think both. They could think that they're trying to steal  
4 the election by flooding election administrators with a crazy amount of absentee ballots  
5 that don't have safeguards on them, or they could think at the end that it's both, or they  
6 could think that there's intent from people to pick up ballots out of trash cans and send  
7 them in or suitcases, as you mentioned, or whatever else. I think it's all of the above.

8 Q So now when the emails say that the Democrats are trying to steal the  
9 election, you're talking about the Democratic Party as a whole having some kind of plan  
10 that they were engaged in to steal the election, right? It's not one-offs. It's not a  
11 random person in Michigan who's doing their job incorrectly. It's the Democratic Party  
12 institution that's the claim that's being made, correct?

13 A I would say I just -- what that phrase, I think, means to me is that Democrats  
14 are going to try and steal the election. It could be an organized effort by left wing soft  
15 bunny groups that the DNC has no idea about it; it could be Democrat officials  
16 themselves; it could be Governors; it could be Secretaries of States; it could be a random  
17 person in Nevada who's a Democrat who's picking up 10 extra ballots and sending them  
18 in. I think it's all of the above.

19 [REDACTED]

20 Q So is that, I mean -- and I know you can't speak for others, and I appreciate  
21 when you qualify that. But as the communications I think -- was your official title  
22 communications director? I'm sorry.

23 A No. It was deputy -- the title is a mouthful. It was deputy chief of staff for  
24 communications. I helped oversee the Department with Michael Ahrens, who was the  
25 communications director.

1                   Mr. Steggerda. But he was also the re -- he was mainly the research director?  
2                   Mr. Reed. Yeah. I remained the research signoff for the emails because I was  
3 previously the research director, so I kind of just kept doing it, yeah.

4                   BY [REDACTED]

5                   Q     So I just want to make sure. Is it fair to say that you had a pretty good  
6 understanding of what the RNC's positions were on these issues, at least from a  
7 communications perspective?

8                   A     Yes, it's fair to say.

9                   Q     And so do you think it was -- what you just said, do you think it was  
10 consistent with the RNC's position that when they were using terms or agreeing or  
11 approving terms, such as Democrats are trying to steal the election, that they meant  
12 literally every Democrat involved in the process, the DNC, Democrats in polling locations,  
13 that if you were a Democrat involved in the voting process, those people were trying to  
14 steal the election?

15                  A     I think it means what I said previously, that it means generally there were  
16 serious concerns on our side, because of the way all of the laws were changed and  
17 whatnot, that there were going to be some Democrat -- possibly some Democratic  
18 groups, some Democratic voters, possibly some Democratic officials out there with the  
19 intent to try and change the laws or stuff ballot boxes, or whatever it may be, to take the  
20 election, to win the election.

21                  Mr. Steggerda. I think what she's -- I think part of the question is, when you see  
22 that phrase, "Democrats," a phrase that you didn't write, do you view that as an  
23 allegation against the DNC, i.e., the National Party Committee and apparatus, or do you  
24 view Dems as a broader concept? That's what she means.

25                  Mr. Reed. Broader concept.

1 BY [REDACTED]

2 Q Yeah. And that's a helpful clarification because there is a perception that  
3 sometimes it can be Democrats; i.e., the political apparatus in D.C., the DNC, the DNCC,  
4 these very large established groups. But if I understand you, this was actually, in fact,  
5 consistent with the concept of a much broader, all Democrats, any Democrat involved in  
6 the voting process who could possibly impact the election, they could be trying to steal it;  
7 a Democratic poll worker, a local Democratic member of the legislature. All of the  
8 Democrats could, in some way, be working to steal the election is more consistent than a  
9 narrower scope of just some high-level Democrats. Your understanding was that  
10 Democrats trying to steal the election could theoretically be all of them, or at least the  
11 ones who had an opportunity to participate in the system somehow?

12 A Yeah. That's the concern, that some of those folks would either commit  
13 fraud or not follow the law properly, or whatever else, yes.

14 Mr. Steggerda. I think, respectfully, in the political world, you might refer to it as  
15 the radical left.

16 [REDACTED] Oh, no, we don't we have to. I think in the emails they call it the  
17 liberal mob, but if -- we can use radical left. I prefer to use the actual terms in the  
18 emails. We can call them the liberal left. I leave it to Mr. Reed as the communications  
19 expert, whatever you're -- pick your poison.

20 Mr. Steggerda. If you knew the laundry list of things I have been called on my  
21 side, it would water your eyes.

22 BY [REDACTED]

23 Q But, you know, all joking aside, I think it actually brings up an important  
24 point, which is, this term was actually not, in fact, limited. It was, in fact, incredibly  
25 broad in terms of who the liberal mob or who the Democrats are. It was not meant to

1 be targeted to a specific group or a specific entity. It was meant to encompass a very  
2 broad group of people. Is that fair?

3 A Yeah. I just -- I described it as how I want to describe it; You've described it  
4 how you want to describe it. I'm just not sure I -- I'm sorry, I don't understand the  
5 question. I just --

6 Mr. Steggerda. She's asking you what was it intended to do. And the question  
7 is, when you were signing off on it, did you think about who wrote it, who intended it,  
8 where the message came from, and what was that intended to do.

9 Mr. Reed. Right.

10 Mr. Steggerda. And you may have thought about it. You may not have thought  
11 about it. She's just asking for your impression.

12 Mr. Reed. Yes, sir. I guess I didn't think about it the way -- maybe -- I guess the  
13 way to answer the question is I would -- I wasn't thinking about at the time, nor am I  
14 thinking about it really now about the way you just described it. I was thinking about it  
15 the way I just described it to you, which in the interests of time I don't want to repeat, but  
16 am happy to.

17 BY [REDACTED]

18 Q No. And I want to be clear that for this entire interview, my interpretation  
19 is irrelevant, and actually the only important interpretation is yours and what was  
20 consistent, to the extent that you know, with the RNC's position or what was consistent  
21 with the RNC's messaging strategy, because that's what we're trying to get. We can sit  
22 here and read these emails long after the fact and guess what they meant, but the reason  
23 that we're talking to you and the reason that your input is valuable is because what we  
24 want from you is just what is the RNC's understanding of what that meant. When you're  
25 approving these emails, what are you thinking they're saying? What is the messaging

1 that you're thinking that this is consistent, this is what we would be okay with, or this is  
2 not what we would be okay with.

3 So to the extent that you remember as we're sitting here today, to the extent that  
4 you're able to tell us that, that's what we want is from you.

5 A Okay. Yeah. So, again, the answer to the question, my -- the way I looked  
6 at that line, the way I see it now and the way I likely -- I can't remember exactly, but the  
7 way I likely saw it then was that when I read a line like, you know, that was sent on  
8 election night or the day after that says, The Democrats are trying to steal the election,  
9 what that's referring to is a wide variety of things. It's referring to Democrat election  
10 officials who may be knowingly, or unknowingly, are improperly following the law when  
11 counting ballots, especially ballots that may be arriving after Election Day. It could be  
12 referring to a Democrat outside soft money group, like a labor organization or some  
13 sketchy, you know, dark money group that's organizing people to pick up ballots in trash  
14 cans in Nevada or California, or wherever it may be. It could be Democrat officials that  
15 change the law with the intent to flood the zone with what they think are ballots that are  
16 better for their side with those safeguards in place to count, to make sure those are  
17 properly counted ballots. It's all of those things.

18 BY [REDACTED]

19 Q And is it fair it could also be no fraud at all, correct, that impacts the  
20 election? You said it could be a lot of things, but is it fair to say it could also be no fraud  
21 impacting the election at this time?

22 A Well, there certainly was some fraud in the election. I guess it's fair to say  
23 that there's --

24 Q Yeah, it's fair to say -- I'm just asking at this time, November 4th -- because  
25 you've said a lot of times things that could be, and I'm asking, at the same time, it also

1 could have been that there was no fraud that was dispositive in the outcome of the  
2 election. Is that fair?

3 Mr. Steggerda. That's a different question.

4 Mr. Reed. Yeah.

5 Mr. Steggerda. Are you aware of -- no. I didn't mean it. You can ask it again.  
6 I'm sorry.

7 BY [REDACTED]

8 Q Mr. Reed, you've noted numerous times things that it could, the way that a  
9 statement could have encompassed different things or this is what it could have meant or  
10 the situation could have been.

11 Is it also not fair that on November 4th, it also could have been that there was not  
12 fraud that was dispositive in the outcome of the election?

13 A I think at the time I would have found it difficult to believe that there  
14 was -- given that the laws were changed and how the election was conducted, that there  
15 wouldn't have been a lot of fraud, or illegal counted ballots, you know, however you want  
16 to describe it, in the election. I guess your point, though, is that is it possible that there  
17 wasn't enough fraud for it to change the votes? Is that what you're asking me?

18 BY [REDACTED]

19 Q It's even more simple than that because, Mr. Reed, sitting here today, are  
20 you aware of how much actual fraud took place in the 2020 election? Not what you  
21 were afraid would happen as a result of the change in laws, not what you heard from  
22 stories or, you know, ballots in trash cans. Sitting here today, do you, in fact, know how  
23 much actual fraud took place in the 2020 election? Like, were your fears borne out, I  
24 guess? Do you know if your fears were borne out is the question?

25 A Yeah, I'm happy to answer that. I think we'll never know, right? I mean,

1 again, it kind of goes to what you're talking about -- what we were discussing earlier with  
2 the definition of fraud. Well, one, we'll never know in your definition, how much actual  
3 fraud took -- how much fraud took place in the sense of what you described earlier with  
4 ballot boxes being improperly stuffed with illegal ballots or suitcases, or whatever.

5 But I think, also, we'll never really know, you know, if absentee balloting, with the  
6 safeguards being removed, hadn't been changed, what -- how that could have affected  
7 the outcome. So I guess I don't really know the answer.

8 [REDACTED] Okay. So that's a very different question. Hold on one second.

9 Can you mute for one second? Mute.

10 Mr. Steggerda. Oh, hey, can -- if you're going to mute, could we just take --

11 Mr. Reed. Do you want to just take five?

12 Mr. Steggerda. Yeah. Let's take a quick -- I think we're -- I think the timing is  
13 good. Let's just do a quick five.

14 [REDACTED] That would be great. Thank you.

15 [Recess.]

16 BY [REDACTED]

17 Q Mr. Reed, I'm going to show you what's been marked as exhibit 3.

18 And while it's coming up, Mr. Reed, I'll tell you this is an email chain -- it's an  
19 approval email chain from November 4th, the day after the election. It's titled:  
20 "Election Defense Fund."

21 Have you heard of the Election Defense Fund that was often touted in TMAGAC  
22 fundraising emails?

23 A Yeah, it rings a bell. I've heard of it, yeah.

24 Q And was it -- did you have any knowledge as to what that was or purported  
25 to be?

1           A     My understanding was -- honestly, maybe -- no, I wasn't on the digital team  
2 then. You know, I know we were obviously -- the RNC and the Trump campaign were  
3 engaged in spending a lot of money legally. There is lawsuits in various States related to  
4 election integrity.

5           Is that what you're asking?

6           Q     Can you see the document up top?

7           A     I can now, yes. Yes.

8           Q     All right. So this is -- it says the title -- the subject line is: "For Approval:  
9     Election Defense Fund."

10           [REDACTED] Is this exhibit --

11           [REDACTED] Can you see okay?

12           Mr. Reed. Yes.

13           BY [REDACTED]

14           Q     So you see you were the last email at the top. It's Mike Reed. You say,  
15     "Ok."

16           Was this typically how you would approve fundraising emails with this response  
17     here?

18           A     Yes.

19           Q     We're going to scroll down.

20           You see Kingley Cortes and Cassie Smedile respond and Alex Cannon writes:  
21     Approved.

22           These are all the individuals kind of we have been talking about. These are your  
23     fellow approvers, right, saying that this email is good to go from their perspective?

24           A     Yes.

25           Q     Okay. I'm going to scroll down to the bottom of page 4 of this email. So

1 right here -- if you scroll up please, this -- is this an example of an email going out? All  
2 right. It has who the sender is, subject line, the preview text?

3 A Yes.

4 Q And then if we scroll down here, this is, like, showing the body of the email.  
5 Is that fair?

6 A Yes. I'm just reading it now. But, yes, it's fair to say that's the body of the  
7 email.

8 Q So this email -- for example, it says: "Last night, President Trump was  
9 leading often solidly, in many key States - in almost all instances Democrat-run and  
10 controlled. Then, one by one, his lead started to magically disappear as surprise ballot  
11 dumps were counted. Very strange."

12 Now, based on our discussion earlier, would it be fair to say that what this email  
13 was describing is exactly what was expected to happen; meaning that President Trump  
14 might lead at first, but then other votes would be counted later that might erode his  
15 lead?

16 A I'm not sure that's totally fair. You know, I'm -- as we talked about, I'm  
17 aware of that argument being out there. But, again, it varied by States. And from  
18 what I remember, even though I'm aware that that argument was out there, that typically  
19 Democrats would do better on absentee ballots and Republicans were more minded to  
20 do Election Day voting, despite that, I still think there were certainly concerns about  
21 ballots coming in -- either ballots that were coming in after Election Day or counting that  
22 was happening after Election Day.

23 Q Counting, by definition, happens after Election Day every year, right? So  
24 that's not strange, correct?

25 A Right, of course. But what I mean by that is counting in the sense that with

1 the flood of absentee ballots was very different in 2020, and the change of laws in some  
2 States was different in 2020. So that's what I mean by that. There was just -- my  
3 recollection at the time was that there was more chance for chaos during that process  
4 which typically maybe wouldn't be chaotic.

5 Q Understood. But that's not what I'm asking, sir.

6 Here it indicates that ballots magically -- his lead started to magically disappear.  
7 And is it fair to say that suggests his lead was disappearing for reasons that were  
8 fraudulent, not reasons that were completely explainable? Is that a fair reading of what  
9 this email is saying?

10 Mr. Steggerda. Tem, just if I could add a foundation.

11 Do you remember this email?

12 Mr. Reed. I do not remember this email, and I would say that --

13 Mr. Steggerda. But one more question.

14 Mr. Reed. Yeah.

15 Mr. Steggerda. Do you know -- looking at it now, do you know what the source  
16 of that text is?

17 Mr. Reed. No -- oh, oh. I would assume that the copy came from the digital  
18 team. I didn't right the line, of course. I assume the copy came from the digital team,  
19 and it was based off of something that either President Trump or the campaign  
20 had -- someone at the campaign had said.

21 BY [REDACTED]

22 Q And you're familiar with President Trump's repeated insistence that there  
23 was something untoward about his lead -- him losing his lead from election night,  
24 correct?

25 A Yes.

1 Q All right. So the lines here, this argument and this paragraph, you're  
2 familiar with this line of argument coming from President Trump, correct?

3                   A     Generally familiar that he was making -- that he was making these  
4 arguments, yes.

5 Q And when he's making those arguments, his suggestion or his clear claim is  
6 that it was intentional fraud, not merely order of counting, correct?

7 Mr. Steggerda. I'm sorry, █ where in the document does it say there's  
8 intentional fraud?

9 [REDACTED] I'm asking as to Mr. Reed's understanding of President  
10 Trump's public claims.

11                   Mr. Reed. I couldn't say. I'm sorry. I don't -- I mean, I think he was -- I don't  
12 want to put words in his mouth, but I thought he was concerned about both, kind of like  
13 what we discussed earlier, the potential for fraud like Amanda discussed earlier but also  
14 the potential for fraud in improper or illegal election counting processes that I described  
15 as well.

17 Q Yeah. I think what we're trying to get from you, especially as a person with  
18 a communications background, is what you were discussing earlier or when you're talking  
19 about the red mirage, when you're talking about election integrity. that's very different  
20 than saying a lead started to magically disappear as surprise ballot dumps were counted.  
21 All caps, very strange. And the pollsters got it completely and historically wrong.

22 So simply from a communications perspective, when we were speaking earlier  
23 about the idea of nuance and the descriptions and statutes changing and procedures  
24 changing, it not being intentional, that's not the tone here, is it, from a communications  
25 perspective? When you use the words "magically disappear, surprise ballot dumps," all

1 caps, "VERY STRANGE," and then I'm going to use air quotes for the record around  
2 pollsters.

3 As a communications person, it seems to suggest here, to my colleague's point,  
4 that there was something nefarious about this process, that the ballot dumps were a  
5 surprise, meaning that you didn't understand that there would be late ballots due to  
6 absentee -- we're not trying to trick you. we're trying to say, from a communications  
7 perspective, your average person reading this would take away that something nefarious  
8 had happened, would they not?

9 A I reject the premise a little bit. I would say two things on this:

10 One, this is language that -- these emails typically would follow language that the  
11 President used. Oftentimes he could put out a tweet and it would be -- I believe, if I  
12 remember correctly, it could show up word for word in a fundraising email prior to  
13 Election Day, and maybe sometimes post-Election Day too. so that doesn't strike me as  
14 strange.

15 The JFC that's between both the campaign and the RNC, as I described oftentimes,  
16 the campaign obviously just made sure the presidential campaign would take the lead on  
17 the messaging.

18 And two, I'm not sure I get that same takeaway from reading this. you know, it's  
19 hard for me to sit here today and know what President Trump was thinking when he said  
20 words like this that eventually our digital team put in copy and made us wait until the  
21 approval change. But the way I see it is it's both, how I described. I think that's the  
22 best way I can answer it. Sorry.

23 Q Well, then let me ask you from a shear research perspective. It says: "In  
24 many key States -- in almost all instances Democrat-run" -- and I'm sorry, I can't read that.  
25 Democrat-run and controlled States I'm assuming?

1           A    Yeah.

2           Q    Democrat-run and controlled. Sorry. We -- there's a technical issue. But  
3 where it says: In almost all instances, Democrat-run and controlled.

4           But there were several States that were not Democrat. there were Republican  
5 States, correct, where he started to have a lead and then additional ballots were counted.

6           So from a research perspective, when that sentence was wrong, did anybody  
7 catch that, discuss that?

8           A    I mean, I don't read it -- I don't know how I was -- what I was thinking at the  
9 time. Sitting here today reading it, I don't think -- I don't think about it that way. I  
10 mean, I think what we were -- again, when I read that line, I think of, you know, some of  
11 the Democrat-controlled cities in swing States, Pennsylvania, Wisconsin, that maybe  
12 didn't -- that had changed laws or had -- you know, our concern was that they weren't  
13 following the proper processes. Election observers had been kicked out. Nevada, I  
14 think I remember, ballots were mailed to every voter obviously whether they had  
15 requested one or not. That's what I see. that's what I think when I read that today.

16           Q    So I'm just -- what I'm trying to get a feel for is earlier in the tone that you  
17 were discussing the changes, do you think that this tone is consistent with the kind of  
18 more-nuanced explanation that you were giving earlier about changes in statutes?  
19 Because if we can't -- as a communications person, it just seems as if -- and I'm just  
20 looking at this as an average viewer reading this.

21           When you use the words "magically disappear as surprise ballot dumps were  
22 counted. VERY STRANGE," all caps, like, the tone here, are you saying that you do not  
23 agree that it suggests something intentional and nefarious, that the election was -- well, it  
24 literally says it, I think, four lines down where it says, "they will try to steal the election."

25           A    So your question was if I think that this -- I'm sorry. Repeat your question

1 one more time.

2                   Mr. Steggerda. She's just asking you in terms of the explanation over the initial  
3 part of the interview about your broader perspective of the concept of Dems trying to  
4 steal the election, she's trying to get your perspective on whether this is a different -- and  
5 different tone and content than the way you've been describing it. Is that --

6                   Mr. Reed. Yeah, yeah. I understand what you're saying, I think. again, I didn't  
7 write this line. you know, typically a lot of the language that I believe that went out  
8 from the JFC, the TMAGAC JFC, was like this. it was language that's spoken in the  
9 President's voice.

10                  So I've given you my explanation or my -- you know, how I thought about the  
11 concerns, both leading up to Election Day and post-Election Day. I can't tell you how the  
12 President thought about them, but I think this obviously is in the President's voice, in the  
13 campaign's voice. But I don't think it radically is different from what I'm describing. it's  
14 different language than I would personally use, but it fits within what I've -- I believe, how  
15 I probably thought at the time was that this language fits within what I've described to  
16 you.

17                  BY [REDACTED]

18                  Q    And we've had actually somebody else, another witness, who was heavily  
19 involved with the history of Republican politics. We've had another witness describe it  
20 in a term that we hadn't heard before, which was red meat, that digital fundraising,  
21 unlike mail fundraising, which I think had more time -- and I'm not going to do justice to  
22 the explanation.

23                  But the concept being that digital fundraising is so immediate. People open it,  
24 they see it, they make the decision right then and there whether to donate. So you use  
25 red meat language in order to kind of rile up the base and make the issue urgent so that

1 there's an instant response in the hopes to donate basically.

2 Is that a concept that you're familiar with in your experience?

3 A Well, yeah. I wouldn't necessarily describe it exactly that way, but I  
4 certainly wouldn't dispute the point that I'm not a digital copywriter and haven't been a  
5 digital director in my past, but I would obviously assume that they're attempting to write  
6 copy that will -- yeah, it's an email so people will look at it quickly, and they're trying to  
7 write copy that would get people to read it quickly and donate. I'm not sure I'd -- I  
8 would not use the term -- I wouldn't necessarily use the term "rile people up," but it's  
9 certainly -- I would imagine it's the strategy of the digital team to write copy in a way that  
10 it gets people to focus on the email, become engaged, and become a supporter of the  
11 RNC or the Trump campaign or the JFC.

12 Q And to be clear, the term and the concept was clearly associated with the  
13 digital fundraising concept. I was curious, are you familiar with it? Was it used in the  
14 communications messaging arena, or was it more traditionally understood, to the extent  
15 that you know, to be associated with donating -- digital fundraising strategy?

16 A You're saying like the term "red meat" whether that's more associated with  
17 communications or digital? Is that what you're asking?

18 Q No. I'm sorry. Let me rephrase the question.

19 Our understanding is that it is absolutely associated with digital fundraising and is  
20 a strategy and technique for digital fundraising.

21 Understanding that your background is comms and not digital fundraising, I'm  
22 asking you, are you familiar with it as a term used in communications or as a strategy in  
23 communications?

24 A It certainly could be. I guess it depends what issue we're on or who we're  
25 communicating to or what medium it is or what, you know, TV channel you're on. I

1 suppose you might talk about an issue a little differently, depending on what audience  
2 you're speaking to, if that's what you're asking.

3 Q I'm trying to make it as simple as I can.

4 As a comms person, do you guys use the term "red meat"? Is that a concept  
5 that's actually used in comms the way it is in digital fundraising?

6 A I think, like, flippantly throughout my career, when we've been talking -- like,  
7 you know, when a real -- you know an issue comes up that our base or conservatives,  
8 strong conservatives really care about, I might flippantly say, Oh, this is a good red meat  
9 issue, if that's what you're asking. That's a term I may use just kind of flippantly to say  
10 that to a colleague or something like that.

11 Q No. That's helpful, because the question was geared at, is it used  
12 across -- is it used across broad fields of politics, or is it just a general fundraising term?

13 A No. I've heard that phrase used by others besides digital people, sure.

14 Q And that was the question.

15 So, in speaking with other witnesses who were on other campaigns, even within  
16 the Republican Party, different Republicans, one of the things that we were told is -- a  
17 moment ago you were saying that captures the tone of the President. And we were  
18 asking the question about the difference in tone between this President and previous  
19 presidents, other representatives.

20 One witness said, Well, the President tends to speak using more red meat, so if  
21 you're capturing the tone of the President, those emails are generally going to have more  
22 red meat.

23 Is that something that you would agree with or disagree with?

24 A I actually kind of disagree with that. I think he talks in a way that  
25 you -- obviously, a unique way that's different than past presidents. he talks in that, I

1 would say a direct tone. he doesn't hold back with his opinion. I guess I wouldn't  
2 describe it always as red meat. I'm sure sometimes it is, but on some issues he's  
3 diverged from typical conservative orthodoxy. So sometimes I maybe would describe it  
4 that way, but other -- I really put him in his -- you know, he talks in his own way.

5 [REDACTED] That's helpful. Thank you.

6 BY [REDACTED]

7 Q Mr. Reed, we have a lot of emails we could show you, all right, that go  
8 through the approval process. And we're going to show you some, but we want to zoom  
9 out and use your time effectively.

10 Mr. Steggerda. And [REDACTED], just to help the process a little bit, you know, I mean, I  
11 have tried to refresh his recollection on a couple of the TMAGAC emails that we've been  
12 talking about. So he's generally familiar with some of the messaging in there, if that  
13 helps.

14 [REDACTED] Thank you.

15 BY [REDACTED]

16 Q Mr. Reed, you often respond to emails with "okay," your approval. And  
17 that's common for the RNC folks. you have an email goes out, and it's very common to  
18 have everyone say "okay" or "approved," and the real edits we ever see at times come  
19 from legal, but it's not -- the comms folks are not weighing in and saying, you know, I  
20 really think we should focus on Wisconsin for fundraising themes, or I don't know if I  
21 would say it this way. that seems very rare in the emails that we've obtained.

22 So is it fair to say that, as far as you can recall, the role that comms -- that you  
23 played was more so as a kind of stop gap to make sure things didn't kind of go off the  
24 rails, were not completely out of sync, but you were not an active in-the-weeds  
25 participant when it came to these fundraising emails and making revisions to them. is

1 that a fair characterization?

2 A I don't remember how many emails I may have edited, but I will take your  
3 word for it, for the sake of this and move along, that what you described sort of as, you  
4 know, I would go through them. If I saw an issue, I would certainly have raised it. But,  
5 yeah, I was making sure I knew at the time that they were messaging that was going to be  
6 tracking more with -- tracking with President Trump and the campaign. And you said  
7 sort of the phrase "get off the rails," yeah, I'm definitely looking through them just  
8 to -- you know, to fact-check them, but also to make sure that it's something that, you  
9 know, the RNC wouldn't be uncomfortable with.

10 Q And is it fair to say that the messaging here, as you noted prior, was driven  
11 by President Trump. So, for example, if President Trump had a view as to the election  
12 being -- the Democrats trying to steal the election, that kind of messaging wasn't the kind  
13 of thing that you were going to revise or kind of weigh in on if that was what the digital  
14 fundraising team thought would be effective. Is that fair?

15 A I might if I had concerns about it. Just because the President or someone  
16 else says something doesn't necessarily mean I'm always going to -- I was always going to  
17 hit approve on it.

18 Q Do you remember any time post-election where you weighed in or offered a  
19 revision?

20 A I can't remember specifically right now, no.

21 BY [REDACTED]

22 Q Sitting here today, can you remember an issue in an email that you  
23 researched to do a fact-check, or to kind of follow up on to see if it was, in fact, true?

24 A I couldn't remember a specific time now. I very well might have. I'm sure  
25 I did. I don't remember all the emails. you know, it's also kind of like what I said

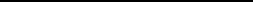
1 earlier. In the ones that my lawyer has showed me and that I'm sure you have, a lot of  
2 them are -- don't have kind of what I described earlier in terms of, like, the price of gas  
3 example I gave or the cost of a bill that -- something easily you can go on and say, oh, this  
4 is off by several million dollars, or whatever it may be, and coming from a research  
5 perspective and saying this fact is wrong. This is a lot of stuff that tracked  
6 with -- rhetoric that tracked with what President Trump -- talking points that the  
7 President was pushing, the campaign legal team was pushing, in some cases RNC legal  
8 was pushing. At the time, that's how I remember them.

9 BY [REDACTED]

10 Q And we also have an understanding that somebody in your position could  
11 really be focused on --

12 [Phone interruption.]

13 Mr. Steggerda. Sorry.

14  That's all right.

15 BY [REDACTED]

16 Q Is that someone in your position would really be focused on the kind of  
17 things you mentioned, is that listing the right State? Is that the right number? But  
18 your role would not be to research a political claim, meaning if a claim said the left-wing  
19 mob is going to steal the election, that isn't the kind of thing that you would go, Oh, Mike  
20 Reed is not going to do research to see is the left-wing mob really going to steal the  
21 election. That's kind of a political statement that's a messaging perhaps role, but it's not  
22 a research fact-check role. Is that fair?

23 A I think that's generally fair. I think if there was a messaging point, though,  
24 that either myself or my colleague or two that was also approving these was concerned  
25 about, we might have raised it, but what you said was I think generally fair, certainly from

1 a research perspective.

2 Q Do you remember any time post-election through January 6th where you did  
3 raise any issues with messaging that was coming out of TMAGAC?

4 A I just can't remember specifically. I'm sure there was a conversation at  
5 some point in November, December with either colleagues of mine or the legal team at  
6 the RNC. I may not have -- I may or may not have -- I don't remember if I ever weighed  
7 in on an email chain, but I'm sure there was a conversation at some point. But I just  
8 can't remember with any specificity when that took place or exactly what it was over,  
9 which lines it was over, or whatnot.

10 Q Now, when you said you were sure there was a conversation, are you saying  
11 you're sure there was a conversation raising issues regarding the kind of TMAGAC emails?

12 A Well, I just remember generally that, you know -- I just can't remember who.  
13 But I would be surprised if a conversation didn't happen. I just -- I remember generally  
14 RNC legal at times, you know, being -- having questions or concerns about some of the  
15 lines. I'm sure we talked about them, but I just don't -- I can't recall -- I can't recall any  
16 with specificity when that happened or which lines it was over or whatnot.

17 Q Now, without getting into advice that RNC legal provided to you, do you  
18 recall a time generally, conversations that the rhetoric in the emails was too  
19 inflammatory?

20 A I mean, I just -- it's hard for me to say this with any specificity. I mean,  
21 generally speaking, I remember this -- you know, having either the legal team or someone  
22 else, comms, or whatever, us talking about it and making sure that the copy that was  
23 coming out of, you know, digital or being approved was copy that both the campaign and  
24 the RNC could both be comfortable with. But I'm sorry, I can't remember specifically  
25 anything more specific than that.

1           Q     So is it fair to say that there were comms -- there were discussions internal  
2     to comms that were aimed at ensuring or, at least exploring that the TMAGAC copy was  
3     not too inflammatory?

4           A     I think it's generally fair to say that I'm sure there were -- generally there  
5     were conversations about making sure that the language was something that both sides  
6     were comfortable with.

7           Mr. Steggerda.    But he's trying to ask a specific question, which is, do you  
8     remember specific conversations within the comms research team in the post-election  
9     period about whether the language was too inflammatory, I think is the question?

10          Mr. Reed.    I'm sorry, I just -- I really don't remember.

11           BY [REDACTED]

12          Q     But earlier you made numerous comments that you may not remember  
13     when, but, if I recall, you were saying you were sure that there was a conversation.   So I  
14     just want to have a clear record.   Because we've heard from other individuals who  
15     worked, even for the Trump campaign, who said that, you know, they raised concerns  
16     that some of these emails in the post-election period were too inflammatory, and that  
17     was discussed even on the campaign side.

18          So what I'm asking is that on the comms side -- and we've also -- we'll look at  
19     some of these emails.   We see RNC legal making edits to the emails -- and this is my  
20     characterization, but I would say toning it down.   At times claims made about President  
21     Trump winning are softened to not say that he won, but to make it a little bit more less  
22     aggressive is how I would characterize it.

23          So arching that backdrop, I was understanding you were saying there were  
24     conversations, although you may not recall the substance and the timing, but you thought  
25     that there were conversations that occurred to ensure that, Hey, are these emails

1 not -- making sure they're not going too far. Is that what you're saying, or do you recall  
2 something else?

3 A No. I think that generally tracks with what I'm saying. I generally  
4 remember conversations either with legal, from legal with comms talking about making  
5 sure that we were comfortable with the language.

6 Q And when you said that you wanted to talk about both sides, is it fair to say  
7 that the RNC, obviously, an entity that outlives a presidential cycle and has concerned  
8 that are 50 States wide and not one candidate specific, is it fair to say that the RNC had  
9 concerns that the Trump -- that in following President Trump's language, the RNC may be  
10 adopting too aggressive of language or too inflammatory of language through the joint  
11 fundraising committee?

12 A Yeah, I think it's fair -- I think it's generally fair to say that there were  
13 conversations amongst legal and comms and digital to ensure that anything that was  
14 being written by the digital team based off of something President Trump or the  
15 campaign said was something we all were more comfortable with.

16 Q And so I will show you some emails. We see legal here. We see Jenna  
17 Kirsch and Justin Riemer going through TMAGAC emails and, as I said, making line edits,  
18 removing words, making them less aggressive.

19 Is that consistent with these conversations that you recall that you're referencing  
20 now?

21 A I think that's fair to say.

22 Mr. Steggerda. And I don't remember, Tem, but is Mike on that email that you're  
23 referencing? I think we've seen it before, but I think that's probably what he's talking  
24 about, that's the kind of thing he remembers.

25 BY [REDACTED]

1           Q     And, Mr. Reed, you are on these emails, on many of them.  And to be clear,  
2 when we look at approvals@gop.com, that thread, that's how you got the emails in the  
3 post-election period to approve, correct?

4           A     Correct.

5           Q     So -- and on many of these, Mr. Reed -- and I'll show you them, but you do  
6 sign off.  So I want to stay kind of zoomed out, Mr. Reed.  So in this time period we're  
7 now coming a week after Election Day, a little bit further, November 11th.  We're  
8 already seeing RNC legal do this kind of revision to emails, pulling them back, softening  
9 them, and you're signing off on those.

10           Separately, it's now public in our investigation, we've made public that Alex  
11 Cannon, who was deputy general counsel with the campaign, led kind of the campaign  
12 fraud search, you might call it, and he, himself, has said that -- that's public, that the  
13 campaign was not finding evidence of dispositive fraud.  And he reflected and told that  
14 to higher-ups in the campaign, including everyone from Vice President Pence to Mark  
15 Meadows to Justin Clark.

16           So I'm just laying the groundwork for what's public on the campaign side.  By  
17 November 11th, 15th, around mid-November, the campaign is not finding any evidence  
18 of dispositive fraud.  Campaign higher officials are telling each other it's not there,  
19 dispositive fraud doesn't exist.  There's no there there.

20           I want to switch to the RNC side where you are.  Are those similar conversations  
21 happening on the RNC side where your understanding is that there is no dispositive fraud  
22 being found?  And I'm not speaking again to structural issues or concerns or speculative,  
23 but I'm talking about there's no actual dispositive fraud the way Alex Cannon has told  
24 Vice President Pence and Mark Meadows that the campaign itself can't find any  
25 dispositive fraud.

1                   Are those same conversations happening on the RNC side?

2                   A     So my recollection is that the first few weeks after Election Day, RNC legal -- I  
3                   don't want to speak for legal, but my recollection is that they were -- we were somewhat  
4                   involved in the process. I believe RNC legal had a lawsuit in Pennsylvania that they  
5                   actually won after Election Day. But then I remember, more like late  
6                   November -- mid-November, late November, the campaign took more of the lead on the  
7                   lawsuits related to the election.

8                   And so sitting in my spot as research sign-off on these comms advisor at the RNC,  
9                   it just wasn't something that my team was engaged with. You have to remember at the  
10                   time, too, we were -- the RNC, obviously, naturally was also pivoted and was very deeply  
11                   involved in the Georgia Senate runoffs.

12                   So I remember being -- in my personal capacity, being involved in the days after  
13                   Election Day, and maybe the following week. And then it was, you know, we were  
14                   really -- you know, obviously, I'm still approving some of this content in the fall. There's  
15                   a major theme going on obviously, of course. But, you know, the RNC also has a lot of  
16                   other stuff going on, as well as, like, clearing out our office to go down and do -- get out  
17                   the vote efforts in Georgia.

18                   So does that kind of answer your question?

19                   Q     It doesn't, but I appreciate that -- I appreciate the explanation.

20                   What I'm trying to get at, is we've established that you were having conversations  
21                   about making sure the emails were not too inflammatory. The campaign side is not  
22                   finding any fraud, and prior to this, the campaign -- the switch you're talking about to the  
23                   campaign taking, I think the role where Mr. Giuliani takes over, I'm talking about prior to  
24                   that timing, the campaign is not finding any dispositive fraud.

25                   And prior to that as well, in emails, Jenna Kirsch, Justin Riemer are making line

1 edits that indicate that RNC appears to be asserting -- ensuring that these emails are not  
2 making claims that cannot be substantiated regarding President Trump having won,  
3 things of that nature.

4 So on those issues, from a comm perspective, did you have any conversations  
5 about a shift in that kind of mid-November period that the RNC should be taking a less  
6 aggressive position or be careful about making claims that President Trump, in fact, had  
7 won the election?

8 A So what I generally remember is that in mid-November, we sort of took the  
9 approach from -- and I'm talking from a comms perspective. Obviously, it tracks very  
10 much with the legal perspective I believe as well, that we were going to let, you know, the  
11 campaign take -- you know, and President Trump largely take the lead on the legal side.  
12 I believe -- I think that's what President Trump wanted, I would assume.

13 That's what I remember, and it's like I remember sort of generally that  
14 conversation about, you know, just saying -- I think we were -- this is not specific, but just  
15 generally, I remember us saying, you know, we've got to focus on Georgia, too. We're  
16 going to maybe echo some of the things we're comfortable with that come out of the  
17 campaign for the President, like retweets or clips of stuff they're saying, that sort of stuff.

18 But I do generally remember us moving away from what I would call like RNC's  
19 own organic content on this issue and allowing the campaign, the President to take the  
20 lead on it, if that makes sense.

21 BY [REDACTED]

22 Q It does. Mr. Reed, I want to ask just a point of clarification, because there's  
23 a presumption in our questions that may not be correct that we really need to clarify,  
24 which is part of why Mr. Cannon and Zach Parkinson as research -- as the individuals  
25 researching on the campaign side, part of what they were doing as research was when a

1 story about a suitcase full of ballots in Georgia came out, or when a trash can full of  
2 ballots came out, they would actually research online, find the facts, and determine if it  
3 was, in fact, fraud. And what Mr. Cannon and Mr. Parkinson were finding was that some  
4 of those claims that the President were making were not able to be substantiated.

5                   Earlier we were talking about, he kept saying, Well, it was possible that this  
6 happened, it was possible that this happened. But then somebody actually sat,  
7 researched, looked up online, watched the video of the Fulton County arena, and actually  
8 looked at whether those claims were true or were, in fact, fraud.

9                   Was anybody at the RNC actually researching any of those claims to see if they  
10 were true or false or over the top or misinformation or mischaracterizing? Was anybody  
11 doing that on the RNC side that you know of?

12                  A    I don't remember the RNC research team ever -- I don't believe the RNC  
13 research team ever did any of that sort of investigative work. I don't recall that. I don't  
14 believe that happened. I don't recall it happening. I believe we left that to the  
15 campaign lawyers, campaign -- I take your word for it, the campaign research team, to be  
16 the ones that were taking the lead on that because, like I said, by mid-November, we had  
17 shifted a little certainly to focusing on the Georgia Senate runoffs and other stuff that was  
18 going on as well as election integrity issues.

19                  Q    And so then, I guess, my question would be, on the RNC side, what is the  
20 RNC basing its approval review on in terms of truth or accuracy or possibilities of  
21 misinformation or -- what is research basing its review on?

22                  A    From a research perspective, I would go back to what I said earlier in that  
23 these messages were -- they didn't have -- typically they wouldn't really have the type of  
24 information in them that, like I referenced earlier, price of gas example or cost of a bill,  
25 that you could easily go up and look online. It's not just like information that you

1 have -- that the RNC research perspective would be able to go on and verify.

2 So typically, these emails were more tracking with talking points that President  
3 Trump was saying, the campaign was using. And if it was an issue of that you just sort of  
4 described on the, you know, legal -- it would often fall to legal, frankly. I would leave it  
5 to the RNC legal team to check some of the stuff as well. I mean, there's stuff that just  
6 they were more involved with or had a greater -- more knowledge on, that they could  
7 jump in and say, Well, this line goes too far on this issue. It's just not the kind of -- from  
8 what I have seen in the emails, they're more -- thinking back on it now, it's the kind of  
9 language that fell more to legal to edit than research, generally speaking.

10 BY [REDACTED]

11 Q So when we look and see the RNC legal -- and we can pull up, for example,  
12 exhibit 6, and here, it's a November 11th email. Subject line: "For approval:  
13 Pennsylvania and election Poll." and Justin Riemer says: "Suggested edit below to RNC  
14 communication" --

15 [REDACTED] Apologies. Just give us one moment.

16 Mr. Reed. Remind me what date this was.

17 BY [REDACTED]

18 Q This is November -- here we go. November 10th. Do you see that there?

19 A Yeah. I see it now, 11/10, yes.

1 [12:59 p.m.]

2 BY [REDACTED]

3 Q All right. So it says to the approvals group that you're on for the GOP.

4 Mr. Cannon says, "Good with edits below incorporated."

5 If we scroll down we see Kingsley Cortes says, "Good."

6 Mr. Parkinson offers a line regarding an awkward phrase.

7 But then, importantly, Mr. Riemer says, "Suggested edits below to RNC  
8 communication."

9 And when we go to page 3 of this document, you can see Mr. Riemer's edits. In  
10 here -- and if you can't see the coloring, then I'll just explain to you --

11 A I can see it.

12 Q All right. So the -- here, it's the shaded-out component is what Mr. Riemer  
13 deleted, and then you see what he adds.

14 So it originally said, "Joe Biden should not wrongfully claim the office of the  
15 President."

16 And Mr. Riemer deletes that and says, "Joe Biden does not get to decide when this  
17 election ends. Only legal ballots must be counted and verified."

18 Would this -- is this a good example of -- this is one example I was talking about  
19 the RNC kind of pulling back the language.

20 Is this the kind of edit that you remember RNC legal -- about a change RNC legal  
21 made to make these emails perhaps a little bit less aggressive in the claims being made?

22 A Yeah. This sort of reminds me, yeah, this tracks with sort of my general  
23 memory of how that process worked. Yeah, it would make sense that legal would be  
24 more in a position to edit that language than the research person -- than myself would.

25 Q So was it your understanding that in fact-checking the accuracy of what I

1 referred to earlier as like the more political claims, that that really would have been a  
2 legal -- a function of the legal folks to pull those and not research?

3 A Yes. If they were -- generally, yes. If they were claims that related to  
4 election process, generally I think that would be something that would  
5 be more -- something legal would want to weigh in on than the research sign-off.

6 Q Now, here are you saying that, "Joe Biden should not wrongfully claim the  
7 office of the President," is about process?

8 Mr. Steggerda. First of all, do you remember this email?

9 Mr. Reed. I don't remember this email, no.

10 BY [REDACTED]

11 Q Because when I read this, Mr. Reed, it looks like, speaking as a lawyer, the  
12 kind of thing a lawyer would say -- would edit -- which is the initial thing says something  
13 more definitive that suggests that Joe Biden would be wrong to claim the office, versus  
14 something that's a little bit softer that says Joe Biden doesn't decide when the election  
15 ends and that legal ballots must be counted and verified, which is the kind of sentence  
16 that someone -- that no one can really object to.

17 So I guess my question here is that, would you agree with the characterization  
18 that they are making the claims from the TMAGAC emails less aggressive as to the state  
19 of the race than they otherwise would have been?

20 A I would agree that they're making the lines of these emails more  
21 comfortable with what RNC legal was willing to approve.

22 Q And from the comms perspective, in you approving these kind of emails, was  
23 it your understanding that the RNC had taken a position that by this time, November  
24 11th, that the claims here that might be consistent with what President Trump was saying  
25 was not what the RNC was comfortable saying?

1           A    I don't remember this specific email. I can't remember when conversations  
2    were had that we wanted to -- if or when we wanted to start toning these down or saying  
3    something different than the campaign was comfortable with.

4           Q    But you do recall that there were conversations at some point that the RNC  
5    was more comfortable with more toned-down emails. Is that fair?

6           A    I think that's fair to say, yes.

7           ████████ Can I ask a quick question? And it's just to get a feel for the  
8    difference between research and legal.

9           In the sentence -- in the middle paragraph -- and I believe if we scroll up, I think  
10   this was talking about Pennsylvania, correct?

11          Mr. Reed. I don't know. Sorry.

12          ████████ I'm pretty sure it's Pennsylvania. I just want to double-check.

13          Yeah. So this was a representation of what was happening in Pennsylvania.

14          You can scroll back down.

15          So I just wanted to ask, so where it says -- and if you can --

16          Mr. Reed. I'm sorry. Just for clarity, I think that if you scroll up, I think from  
17   Team Pennsylvania, wasn't that the last email? It was like from Team Pennsylvania.

18          Mr. Steggerda. It says Pennsylvania and a poll, I believe. But can you scroll to  
19   the top just so we can make sure Mr. Reed --

20          Mr. Reed. You could be right. I just want to make sure we're all on the same  
21   page.

22          Mr. Steggerda. Yeah. It says, "For approval: Pennsylvania and election poll,"  
23   and it's dated November 10th on the top.

24          Mr. Reed. Okay. Yeah, but that's a different -- now we're on a different email.  
25   When it says, "Sincerely Team Trump Pennsylvania," I think this is a new email --

1  Which State is it referring to?

2 Mr. Steggerda. Are those consecutive Bates numbers, Tem? Are we looking --

3 [REDACTED] Yeah. What's happening here is that there are multiple  
4 emails for approval. The first email is talking about Pennsylvania. That stops  
5 [inaudible] email. And you can that's been sent under the subject line, "Pennsylvania  
6 and election polls." So they're two different emails.

7

8                   Q     Yeah.  It's unclear.  It's very difficult in this format to tell what State it's  
9     about.  I guess, if you scroll down, Becky, I guess maybe there were -- no.  No.  Right  
10    to the relevant part.  Yes.

11 So I had assumed that that was Pennsylvania just because my understanding is  
12 one of the lawsuits filed in Pennsylvania was that the observers were too far away.  
13 Unfortunately the way that these are clumped, it looks like they're both about  
14 Pennsylvania, but it's impossible to say looking at this email.

15           But -- and actually, it moots the question if you can't say -- I mean are you -- sitting  
16       here today, are we saying that it's observers everywhere? Do you think that they were  
17       saying observers in every State were not allowed? That just seems --

18                   A     I don't know. Sorry. I know that there were -- I'm just generally aware  
19                   there were issues with observers in several States, but I couldn't sit here today and tell  
20                   you exactly which this one was referencing.

21 Q Well, here's the reason I ask. Let's assume for a moment that it's  
22 Pennsylvania, which is the most likely relevant State that that would have applied to  
23 based on the sequence of emails. The Pennsylvania observers were allowed. The  
24 lawsuit alleged that they just weren't allowed to stand close enough. And the factual  
25 section of the brief stated that they were allowed in there.

1           So to the extent that the email alleges that the observers were not allowed in any  
2 way, shape, or form to do their job, to the extent that they were absolutely there and the  
3 claim was just they weren't allowed to stand close enough, would that have been a  
4 research question of whether that was true or not or would that have been a legal can we  
5 say that if they were, in fact, there but not standing close enough? Like, where would  
6 that issue have fallen in terms of responsibility for approval?

7           A     So I would say it could be both, right? I would say it probably falls a little  
8 more -- this isn't a black-and-white thing, right? I mean, if I saw something I thought  
9 was wrong, I probably would have spoken up.

10           But this one seems to me a little bit more on the legal just because they were  
11 more in tune with -- they were reading the briefs. They were more -- they know the law.  
12 They know how the law was changed. They're reading the affidavits that are coming in.

13           So it probably would have fallen more to them, but it could have fallen to research  
14 too. I hope that answers --

15           Q     But if I understood you correctly earlier, and this is kind of why I asked the  
16 question --

17           A     I also want to say, too, from what you just described, which I don't  
18 remember exactly what happened in Pennsylvania with the observers, but from what you  
19 just described, I'll take your word for it, in terms of how this was about they were allowed  
20 in the room, but I'll take your word that it was a distance issue.

21           I mean, I think that still tracks with that. I mean, they weren't allowed to do their  
22 jobs if they're not close enough to observe the process. That would be, just reading it  
23 now, that's kind of my gut -- my knee-jerk reaction based on what you were just saying.

24           Q     Yeah. And I guess my question earlier was, I guess I can understand you  
25 could be saying that research was even researching that. Like, would somebody have

1 even googled to see were observers present, or would that have been a legal issue?

2           Because what I was trying to get at earlier was, if you weren't investigating, if you  
3 weren't researching, if you weren't, like, searching the claims that were being made in  
4 those emails, how would you know whether observers were present there or not or  
5 whether that claim was true?

6           A    I don't remember that specific email. I very well at the time may have  
7 known that issue about the observers. I don't remember sitting here now a year and a  
8 half later. But I could have very well been aware of that and read that line to mean just  
9 what I said. I just -- I can't remember specifically.

10           Legal's a little bit more -- you know, they were more in tune to it, because they  
11 were their lawyers and they were following it a little closer than I was. But it could have  
12 absolutely -- you're right, it could have been something that I looked up too or knew and  
13 just signed off on because I knew it to be true. I just don't know.

14           Q    Okay. And I guess I want to be careful because you said I'm right. And  
15 what I was gathering from your testimony earlier was that you guys were not, in fact,  
16 researching or looking those things up.

17           And what it sounds like you were saying was you can't remember whether you did  
18 or not, or it's possible that you just knew that fact off the top of your head.

19           Do you see? I'm trying to see from like --

20           A    I do. I do. I think what I'm talking about, in my head we're talking about  
21 two different things. We weren't -- when I say we, the RNC research department wasn't  
22 necessarily -- especially I don't think we were in the period, but especially after halfway  
23 through November -- researching like kind of what you were talking about that Zach  
24 Parkinson's team was researching some of the claims that came up.

25           But RNC research, just in my job, was generally aware certainly about the issue I

1 described with election observers, like I said, in the week or two after election day, was  
2 aware of affidavits that came in about observers and what they witnessed.

3 So I guess what I'm trying to say is that I certainly was generally aware of and  
4 tracking these issues. What I was saying earlier was a little bit different. The RNC  
5 research team wasn't doing like a deep dive on every little fraud claim that was popping  
6 up. I think that fell more to the campaign.

7 Mr. Steggerda. And I know this is obviously a voluntary cooperative interview.  
8 He's telling you what he remembers and doesn't.

9 I don't want to object to the premise of your question, but I can tell you from  
10 personal experience that the Pennsylvania observer issue was all over the news for at  
11 least a week after the election, and there was a legitimate -- you don't want me to testify,  
12 but I just want to get the -- want to make sure that --

13 [REDACTED] No, no, no, Todd. Todd, I want to stop you because I don't want to  
14 put your ideas into his head.

15 Mr. Steggerda. Okay.

16 BY [REDACTED]

17 Q So I'm not devaluing what you're saying. But you're raising a point, which is  
18 exactly what I was trying to get out, which is what I'm trying to figure out was when you  
19 were doing, quote, research on some of these claims, was it, "I'm reading the news, I'm  
20 seeing these articles," right? It wasn't independent verification in some way of whether  
21 those facts were, in fact, true -- whether those claims were, in fact, true.

22 To Mr. Steggerda's point, there was a lot out there at the time. Was the RNC  
23 research team doing anything to independently research or verify that beyond what was  
24 being seen in the news or beyond what the campaign was claiming?

25 Was there any independent verification process that the RNC research team was

1 doing to verify truth or falsity of those claims?

2 A Yeah. I guess, it depends on the claim. But using this example of the  
3 election observers, I'll give you -- this comes to my mind, I mean, on the Friday after  
4 election day, I was with the chairman in Michigan and in Georgia, these were all public  
5 press conferences, where we were talking about -- we just did little quick press  
6 conferences where she spoke, where we talked about the issues that we were seeing in  
7 the affidavits with poll observers in just those two States.

8 So just as a comms person, one, I'm hearing stuff from the legal team. And two,  
9 I'm following the news very closely. And it's something that was widely reported and  
10 undisputed at the time, at least in our head undisputed, that election observers were  
11 kicked out of rooms, were pushed back in the name of COVID, were not able to do their  
12 jobs.

13 Then I guess I wouldn't, like, be calling up election observers myself, being like,  
14 "Hey, I read this on the news. I heard it in affidavits. Is it true?" I mean, that's not  
15 something that I could typically do. That's something only a lawyer could do.

16 Does that answer your question? I mean, I guess you're verifying it in the sense  
17 that it tracks with your understanding of what's going on based on what you've heard in  
18 the news or what you've heard from the legal team. That would constitute research  
19 checking on something.

20 And we don't have quite the ability -- research doesn't have quite the ability to go  
21 quite as in depth with the knowledge that legal would in many cases, especially on this  
22 subject.

23 But we still would pipe up if there was something that we read that we had never  
24 heard of or were concerned about the factualness of it, whether it was factual or not.

25 Q I think that does help kind of. It helps us understand what the research

1 team was doing in terms of verification. And if I understand you, there was a lot coming  
2 from news sources and coming from legal. Is that fair?

3 A I think that's fair. Yeah.

4 Q Okay.

5 BY [REDACTED]

6 Q Now, Mr. Reed, I'm not going to show you all these emails. Instead I'm just  
7 going to make representations to you for the sake of time. But to the extent you want  
8 to see anything I'm going to say, we have it available, okay?

9 A Okay.

10 Q All right. So if we look at the emails we have -- and, again, the edits from  
11 RNC legal around this time continue. So we have a November 11th email -- excuse me  
12 one second.

13 We have an edit from RNC legal that the original line says, "President Trump won  
14 this election by a lot," and it's revised to, "President Trump got 71 million legal votes," but  
15 it removes that he won the election from the fundraising email.

16 There are other edits that revise -- I'm sorry?

17 A I didn't say anything. I moved the table.

18 Q My apologies.

19 There are other edits from RNC legal, also November 11th, around that time, that  
20 include you on them, where they're changing "secure four more years," it changes the  
21 term, and instead it's use "defend the election."

22 So instead of "four more years," it now says, "finish the fight."

23 And those edits, again, continue November 11th, November 12th, from Jenna  
24 Kirsch.

25 We have a November 13th chain. And then even takes us to November 18th,

1 where there's certain edits, like she removes "steal" to "take" or she says "remove  
2 'stealing the election.'" This is at November 18th.

3 And then by November 20th there are again edits from Ms. Kirsch that  
4 remove -- change "voter fraud" to "voting irregularities," and removes a line that says,  
5 "Joe Biden did not win this election."

6 And again, I'm happy to show you any of those if you want to see those. We're  
7 just trying to be efficient time-wise.

8 But again, I proffer you all that because it seems consistent with what you were  
9 saying earlier, that there were conversations internal to the RNC about the RNC not  
10 taking as aggressive a posture about the election results as the Trump campaign.

11 Is that a fair characterization?

12 A Yeah. I think it's fair to say that the RNC legal team was reviewing those to,  
13 like I said earlier, to make sure that communications that went out to the JFC, which is a  
14 combination of both the campaign and the RNC, were lines that the RNC legal team was  
15 comfortable with.

16 Q So, for example, here, where there's a revision, where the original text says,  
17 "He did not win this election," and it's changed to, "He hasn't won this election," those  
18 kind of changes, the concern is that the original copy would be potentially factually  
19 incorrect, so it's softened to make it more neutral language. Is that fair?

20 A Yeah. It's just hard for me to speak for someone else's edit. But I think  
21 it's generally fair to say, like I said earlier, they were editing these lines to ensure that  
22 they were comfortable, lines that the RNC legal team was comfortable being sent out as  
23 communications from the JFC.

24 Q And those RNC legal determinations, was that consistent with where the  
25 comms team was as far as a messaging point, meaning by mid-November, getting to late

1       November, the comms team also had adopted a view that the RNC should be less  
2       aggressive about its assertions regarding the election?

3           A    Yeah. The way I remember it is we -- definitely communications works  
4       closely with RNC legal. And by mid-November, I think that we talked about how we  
5       would let the campaign and the President take the lead in terms of like organic  
6       communications on this issue, and that we were also focusing on the Georgia Senate  
7       races. So we had a couple other things going on.

8           But yeah, I remember generally letting -- having conversations that we would let  
9       the campaign take the lead on the legal challenges and let them take the lead on talking  
10      about those issues. And we would echo from time to time things that they said, but  
11      they were really in the driver seat on that.

12           Q    And as part of that letting them take the lead, was there an understanding  
13      from the RNC comms' perspective or more broadly at the RNC that President Trump and  
14      the campaign were going down a route that was different than what the RNC wanted to  
15      go down or believed in?

16           A    You know, I think that it's how I described. I mean, look, I'm sure the  
17      lawyers -- I'm not going to disagree with you, but I'm sure RNC lawyers may have  
18      disagreed with the way the campaign lawyers moved forward.

19           But from a comms perspective, it was really just a decision that we were going to  
20      let them take the lead. We would echo -- what I mean echo, I mean we would retweet  
21      or repost certain clips if we were comfortable with it, and that they were going to focus  
22      on the election integrity challenges and communications and the lawsuits related to that,  
23      and we would echo some like I said, but we were also focusing on the Georgia Senate  
24      runoffs.

25           Q    Now, you said you would echo some or that if you were comfortable with it.

1       Is it fair to say that there was messaging going out of the Trump campaign that the RNC  
2       was uncomfortable with or purposely chose not to echo?

3           A     I think there's certain messaging around these issues that we would have  
4       talked about the issue differently.

5           Q     And when you say differently, you mean that you would not have made -- is  
6       it fair to say you would not have made some of the claims regarding voter fraud in the  
7       election that the campaign was making, President Trump was making?

8           A     You know, it's kind of like how I described earlier. I think my  
9       perspective -- obviously, communications speaking in part -- speaking for the RNC at the  
10       time, that we were very concerned about how the election was conducted. Don't want  
11       to go through it all again, but the way the laws were changed and the way that the  
12       COVID, all those safeguards that were thrown out.

13       But again -- so we had concerns about the way the election was conducted  
14       absolutely. Just the decision was made in mid-November, late November-ish, that the  
15       campaign was going to take the lead on the legal strategy there and the communication  
16       strategy, the legal strategy, and we were going to echo some of it. It also focused on  
17       Georgia Senate runoffs and other stuff we had going on.

18       Q     And when you say take the lead, what I'm not understanding is, what does  
19       that mean? Because you have a Joint Fundraising Committee, you have RNC  
20       copywriters drafting copy, you have RNC folks, like yourself, weighing in and reviewing  
21       the copy.

22       When you say take the lead, it looks here that the RNC's now taking a more  
23       aggressive posture than it had in prior emails. You look at the November 4th, 5th, 6th  
24       emails that you sign off on, we don't see RNC weighing in, we don't see really edits there.

25       You look at the time period you're talking about, about the campaign taking the

1 lead, a kind of separation there, and then you see Jenna Kirsch coming in with a heavier  
2 pen and offering these edits.

3 So when you say take the lead, would that be fair, to frame it as RNC was  
4 allowing -- was basically letting the Trump campaign do what it wanted and the RNC was  
5 doing something that at times might be separate or diverged from that?

6 A Yeah. I think it's fair to say that both the RNC and the Trump campaign had  
7 concerns, significant concerns about the way the election was conducted. But it was  
8 recognized in mid-November that the campaign was going to take the lead on that.

9 And yeah, I guess it's fair to say that, as I said earlier, there's some things that  
10 were maybe tactically -- was either said or tactically legally done by the campaign that  
11 maybe our lawyers in RNC communications would have done a little bit differently legally  
12 or communicated differently. That's fair to say, yes.

13 Mr. Steggerda. But when you referenced taking the lead, are you in part  
14 referencing the campaign legal team going in a direction and then the messaging that  
15 follows? Or is it something more defined?

16 Mr. Reed. I think -- I'm sorry, I don't really understand. I think I'm talking about  
17 the campaign taking the lead on the lawsuits and election integrity-related issues and the  
18 communications that went with that.

19 Mr. Steggerda. That was my question.

20 BY [REDACTED]

21 Q But, Mr. Reed, by the time you get to later November, a lot of the lawsuits  
22 have already been filed and been resolved. So it's not -- as I recall -- and if you recall  
23 differently -- but there isn't a late November new flurry of litigation to take the lead on  
24 that somehow -- like a lot of litigation has already occurred and really is closer to the  
25 election day, not late November.

1           So it's been pretty widely publicized that the further you get from election day,  
2 more and more people see the election as unlikely that Joe Biden is not going to be the  
3 next President and that President Trump is only going to have one term.

4           Is that what's happening here? Meaning, at some point the RNC says we're  
5 going to focus on Georgia, and then President Trump decides to keep making claims  
6 about the election that are aggressive in nature and more inflammatory in nature, and  
7 the RNC decides that it will adopt certain things, but not everything.

8           Is that fair from what you recall?

9           A        Yeah. That last phrase I think generally tracks with what I remember, is we  
10 would adopt certain things but maybe not other things, and that's because we had  
11 significant concerns with the way the election was conducted. But I recognize that our  
12 lawyers may have handled the challenges or legally strategy-wise differently than the  
13 campaign.

14           Q        But even more than legal strategy, is it also fair that, yes, you may have had  
15 concerns and spoke to how the election was conducted when it came to mailing out  
16 mail-out ballots, but the RNC didn't want to adopt more broad claims that the campaign  
17 might have been going with, such as Dominion or tens of thousands of dead people  
18 voting or other things like that?

19           Is that what you're really talking about here, that the RNC didn't want to adopt  
20 those kind of voter fraud claims the President's campaign was supporting?

21           A        Those two examples you just cited are fair examples of -- I can't speak for  
22 the campaign. I don't know when or how long they talked about the Dominion issue or  
23 the other issue you just mentioned. I forget what it was.

24           But yeah, I think it's fair to say that the RNC Dominion issue popped up that wasn't  
25 one that we were comfortable with continuing to push.

1           Q     And the same thing with dead people. The President even through  
2     January 6th was claiming dead people voted. And that's another example, right, that  
3     the RNC diverged from the President and would not adopt or go along with? Is that fair?

4           A     I don't remember that one as well. So I can't quite speak to that one. But  
5     I'll take your word for it. I think that that example and the Dominion example are two  
6     examples of issues that maybe the campaign -- I don't want to speak for them or how  
7     often they pushed it or when. I don't remember exactly. But I'm generally aware that  
8     they talked about those issues at some point and that they talked about those and we  
9     likely didn't because our legal team probably just wasn't --

10           Mr. Steggerda. Just in terms of the -- they're not asking for, and I don't want you  
11     to render the specific advice that the legal team gave.

12           Mr. Reed. Yeah. Of course. Right. Yeah.

13           BY [REDACTED]

14           Q     Mr. Reed, are you familiar with the Save America PAC?

15           A     Yes.

16           Q     Okay. So that's President Trump's leadership PAC, correct?

17           A     Yes.

18           Q     And I believe on November 11th the PAC was formed and then the joint  
19     fundraising agreement was revised to include the PAC as the primary recipient of the  
20     Trump portion of TMAGAC funds.

21           Does that comport with your recollection?

22           A     Can you say -- I don't remember [audio malfunction].

23           [REDACTED] [Inaudible] after the election. We don't expect you to remember the  
24     exact.

25           [REDACTED] And we'll proffer to you that's the date.

1           On the Trump campaign side, there was a lot of public reporting that the funds  
2        were represented publicly to be going to election defense -- to an election defense fund  
3        or otherwise to fight to pay for election recounts, but the money by a week after the  
4        election was, in fact, going to Save America, which was not doing any of those things.

5           Is that an issue or topic you recall in November discussing with anyone or being  
6        aware of, that the money was going to Save America and not to the campaign from let's  
7        call it mid-November forward?

8           Mr. Reed. That's not something I remember talking about at the time. You  
9        know, if an entity was added to the JFC, I wouldn't have --

10          Mr. Steggerda. Did we lose them?

11           [REDACTED] Yeah. Our video just went out.

12          Mr. Reed. Oh, okay. I'll keep talking.

13          If an entity was added to the JFC like Save America is just not something in my  
14        position, comms or research, that I would have -- I would have known about it from if the  
15        press had mentioned it or it was mentioned to me after the fact. But it's not something  
16        I would have been in tune to that process.

17          And I certainly wouldn't have visibility on what Save America was or was not  
18        spending money on. I know that the RNC, and I know from, obviously, media reports,  
19        that the Trump campaign was certainly spending quite a bit of money on legal challenges,  
20        legal issues surrounding the election integrity and the election at the time.

21           [REDACTED] How do you know that?

22          Mr. Reed. I know that -- I guess I know that, from an RNC perspective, I know  
23        that we were -- I believe, if I recall, we were involved in some lawsuits post-election day  
24        and spending legal resources around these issues.

25          Mr. Steggerda. Do you actually know for sure who paid for those lawsuits --

1 [REDACTED] No, Todd. I so appreciate you, I really do. I really don't want you  
2 asking questions. Let me fix my question.

3 BY [REDACTED]

4 Q Do you actually know how much or what the Trump campaign spent in terms  
5 of legal efforts to challenge the 2020 election?

6 A I don't know off the top of my head how much they spent. I'm aware  
7 from --

8 Q Go ahead. You started to say, I think, how you were aware of that.

9                   A     I just know that -- I don't know it for a fact, I didn't work at the campaign,  
10                  but, I mean, there were obviously a lot of lawyers working for the campaign on various  
11                  legal challenges through November and I believe through December.   But I didn't work  
12                  on the campaign, so I guess I couldn't tell you.

13 Q And with regards to the Save America, there were a number of reporters  
14 who actually reached out once the disclaimers were changed and reached out to the  
15 Trump campaign asking if it was misleading to say that the funds were going to an  
16 election defense fund or were going to challenge the election when they were, in fact,  
17 going to the leadership PAC.

18           But a portion of the funds were still going to the RNC. And what we were trying  
19           to figure out was did any of those reporters reach out or did you as comms for the RNC  
20           ever get inquiries regarding the misleading nature of fundraising emails that said the  
21           funds were going to election defense or the 2020 election efforts when they were, in fact,  
22           going to Save America and the RNC.

23                   A     I don't remember specific media inquiries around that issue, if that's what  
24     you're asking. I guess I remember maybe after January those issues, getting inquiries on  
25     those issues. I just don't remember if in November or December I ever had to deal with

1 that issue. I don't remember.

2 Q And after January, that was about that issue, the fundraising emails that  
3 were representing that?

4 A I just generally remember, because in my general understanding of FEC  
5 reports and when they're filed, I believe there's one filed at the end of January if I'm not  
6 mistaken. It may pop in mid-February, me sort of guessing on the spot.

7 So obviously when FEC reports are filed reporters get to go through and see  
8 what's being spent. So that's the only reason I say that, is because I generally remember  
9 FEC reports popping, being made public, I think either at the end of the year or at the end  
10 of January, and maybe that's when reporters started to go through the expenditures and  
11 see what was being spent on what by those various entities. And we may have or likely  
12 may have got an inquiry at the time, but I can't remember specifically.

13 Q Do you remember ever having discussions internally at the RNC -- and again  
14 not asking you about legal advice that you may have received -- but do you remember  
15 having internal discussions regarding claims from the media or claims from anybody that  
16 the nature of the fundraising emails were misleading given where they said where the  
17 money was going versus where the money actually went?

18 A I don't remember any conversations like that, again because my  
19 understanding at the time and certainly from the RNC perspective and media reports was  
20 that there was quite a bit of -- there was money being spent on litigation around these  
21 issues. I don't remember conversations like that happening.

22 Q Okay.

1

2                   BY [REDACTED]

3                   Q    Now, Mr. Reed, I want to switch gears.

4                   Are you familiar with Salesforce being the email service provider for the RNC and  
5    TMAGAC?

6                   A    Yes.

7                   Q    And are you aware that after January 6th Salesforce released a statement  
8    saying that it took action against the RNC because of -- effectively because of TMAGAC  
9    emails and trying to avoid future politically incited violence?

10                  A    I generally remember TMAGAC -- excuse me, Salesforce -- taking an action.  
11                  Was it -- I'll take your word for it -- was it the RNC that they shut down, or was it the  
12    TMAGAC JFC?   Or was it the Trump campaign?   I don't --

13                  Q    I'm going to ask you what your understanding of what that action was.   But  
14    our understanding is that the account at Salesforce is the RNC account, but that account  
15    was used to manage and send out the TMAGAC emails.

16                  But what I want is your understanding of what involvement you had in responding  
17    or otherwise awareness to Salesforce's post-January 6th action.

18                  A    I don't remember.   I do remember that story coming out.   There was  
19    obviously a lot of Salesforce, I feel like there were others too, providers that  
20    post-January 6th were taking action or cutting off work with the Republican Party or  
21    Republican Senators or whatnot.

22                  So I generally remember that story coming out about Salesforce taking an action.  
23                  And I think you're right.   I take your word for it.   That rings a bell that it was RNC  
24    Salesforce account, so it was -- but I'm sorry.   I just don't remember specifically.   It's a  
25    while ago.

1           Q    Were you the one who from the RNC comms side, were you involved with  
2 that, or was that someone else who took a lead on dealing with that?

3           A    I mean, if we got an inquiry from a reporter I certainly would have seen the  
4 inquiry and been part of putting a response together for it. I just don't remember. I  
5 take your word for it. I'm sure we did get an inquiry. I just can't remember specifically.

6           Q    Do you remember doing any kind of internal investigation on your end as to  
7 what happened with Salesforce, what the action was, what the RNC did in response,  
8 whether it was turned back on, anything of that nature?

9           A    I don't remember any kind of investigation. From my recollection, I think it  
10 was turned back on -- Salesforce turned back on the RNC account, if that's what  
11 happened, pretty quickly after that because I know we continue to use Salesforce. So --

12          Q    And was it your understanding that action was taken because -- well, what  
13 was your understanding as to why Salesforce took action against the RNC?

14          A    I mean, if I had time to go back and read the stories it would refresh my  
15 memory more. But I'm assuming it was an issue with they -- their company was not  
16 comfortable with -- I'm obviously thinking -- best of my recollection, from the company's  
17 perspective, maybe they weren't comfortable with some of the messaging that had come  
18 out after January -- you know, in the lead-up to January 6th or after January 6th,  
19 something along those lines.

20                   BY [REDACTED]

21          Q    Were you aware of complaints that Salesforce had received prior to  
22 January 6th regarding the inflammatory tones of the emails that they were sending?

23          A    I don't think I would be aware of those complaints. I certainly don't  
24 remember dealing with that.

25          Q    When you said you don't think you would be, is that because you think that

1       would have been somebody else's job to have that relationship with Salesforce?

2           A    Right. I think the digital team is usually the contact with Salesforce. I  
3       don't remember if they ever -- if someone on the digital ever had that consideration with  
4       Salesforce and flagged it up. I don't remember that ever happening.

5           Q    Okay.

1

2 BY [REDACTED]

3 Q Are you aware of anyone else at the RNC raising concerns about the  
4 inflammatory nature of the emails any time post-election through January 6th?

5 A Besides the legal team you mean?

6 Q Well, if I recall earlier, you mentioned that you thought there would have  
7 been conversations about the nature of the emails and tone of the emails, and I just want  
8 to drill down.

9 Was that something that you understood to be coming purely from legal? Was  
10 that anyone else that raised those issues?

11 A I think -- I just don't remember. I'm sorry. It's kind of the  
12 conversation -- or what I said earlier is that I'm sure there were conversations being had  
13 between legal and the communications team and the chairwoman and staff. I just -- I  
14 can't remember specifically when or how long those -- I know -- I vaguely generally  
15 remember it was in November having some of those maybe, but I can't remember  
16 specifically beyond that.

17 Q And when you say those conversations, you're saying that you recall -- at  
18 least generally, you recall conversations that senior RNC people had regarding the tone  
19 and the substance of these fundraising emails?

20 A Yeah, just because it makes sense to me that we would have. I just -- I  
21 don't remember -- I can't remember much beyond that. I remember the legal team  
22 flagging some things. I generally remember us discussing it. But I'm sorry, I just don't  
23 remember with much more specificity beyond that.

24 Q Okay.

25 A Which would make sense. That's kind of why I say that, is because it would

1 make sense for us to be talking about the language that was going out on fundraising  
2 emails that we share with another entity. I mean, it makes sense that we would have  
3 conversations to make sure we were comfortable with it and comfortable with what the  
4 other side wanted to say.

5 Q All right. So that sounds a little different than what I understood you were  
6 saying earlier.

7 You're saying that you're thinking there were conversations just because it would  
8 make sense to have conversations, no matter what, because it's another entity. Or are  
9 you saying that there was something about these emails specifically that might have  
10 required a conversation?

11 Because earlier we talked about a mid-November kind of diversion. There were  
12 things the RNC was uncomfortable with, that there were things the RNC was willing to  
13 adopt, there were other things the RNC was not willing to adopt, which does not sound  
14 like run of the mill, "Let's have a conversation because we're two entities."

15 It sounds like it's the former, that these meetings were about ensuring the RNC  
16 was not going down a path that the organization wasn't comfortable with. Is that right?

17 A Yeah. I'm not -- what I said earlier is right. I don't remember specific  
18 conversations, but I do -- yeah, I generally remember in regards to these emails in the  
19 post-election period conversations to make sure that the legal team and the chairman's  
20 office or whatever else was comfortable with the language that was going out of the JFC.

21 Q Now, with regard to AMMC -- are you familiar with an organization called  
22 AMMC, American Made Media Consultants?

23 A Yeah. I think I'm familiar with that. Yeah. That's like the -- yeah. I  
24 think I know what that is.

25 Q All right. So --

1 BY [REDACTED]

2 Q Wait. Wait. Wait. You started to say that's the what? How would you  
3 describe it?

4 A I believe that was the entity that did advertising on behalf of -- I can't  
5 remember whether it was both the campaign and the RNC, but it was an entity -- I think it  
6 was -- I don't remember. It was an entity -- and this has been done before, the Romney  
7 campaign, I believe, either the Clinton campaign or the Biden campaign did it similarly, I  
8 think I'm talking about what you guys are asking me about, where it's an entity that in  
9 order to more efficiently spend advertising dollars it all runs through this one entity, the  
10 digital and TV fundraising.

11 That's generally my understanding. I could be wrong about some of those  
12 details, but that's my understanding.

13 Q Sitting here today, do you know where you got that understanding? Is that  
14 just your history of politics or did you ever actually have a role where you came to know  
15 that information?

16 A No, I didn't have a role in that entity. It's just my history of politics. And  
17 also I remember reading stories about it at the time, and maybe we got some inquiries  
18 about it. That's where that answer comes from.

19 Q Inquiries from the press?

20 A Yeah. Again, I don't remember specifics. I just feel like we got an inquiry  
21 on that at some point and just said, "Hey, what is this entity that has received an  
22 expenditure from the RNC maybe or from the campaign?" I don't remember  
23 specifically, but --

24 [REDACTED] Mr. Reed, you did, in fact, get some inquiries from the  
25 press, and I think from the war room, the RNC war room, between Jessica Parks and

1       Nicole Smith (ph), that send you some articles that went out. One of them is that  
2       lawmakers demand that the FBI and FEC investigate the Trump campaign violating  
3       Federal law by spending hundreds of millions of reelection money through a company the  
4       White House adviser Jared Kushner created. And then you send those emails to Tim  
5       Murtaugh, the comms director at the campaign.

6                   Do you recall -- I mean, you mentioned the media inquiries. Does this ring a bell  
7       what I'm talking about, these inquiries, that you then forward these stories to  
8       Mr. Murtaugh?

9                   Mr. Reed. It rings a bell enough for me to sit here and not dispute that it  
10       happened. But I don't remember specifically details on it.

11                  Mr. Steggerda. [REDACTED] could you give us the approximate date on that document?  
12                  [REDACTED] Yeah, I'm talking about like the third week of November,  
13       right around -- right prior to Christmas.

14                  My question is, do you recall having any conversations with anyone, whether the  
15       Trump campaign or in the White House role, regarding AMMC?

16                  Mr. Reed. I don't recall having any conversations, no. I'm not disputing it  
17       happened. I'm just saying I don't remember.

18                  [REDACTED] Do you recall anybody ever discussing it with you and calling it the  
19       pass-through account?

20                  Mr. Reed. I don't recall that, no.

1

2 BY [REDACTED]

3 Q Do you recall anyone -- besides that language -- do you recall anyone having  
4 a discussion with you about that entity being used as a kind of pass-through entity that  
5 the campaign, in fact, controlled?

6 A I don't remember. Again, I'm not disputing it. I'm just saying I don't  
7 remember any conversation like that.

8 Q Okay. Thank you, Mr. Reed.

9 Now, Mr. Reed, again switching gears, I want to talk about -- there's been the  
10 term alternate electors, fake electors, whichever way you want to label it.

11 Do you know what I'm talking about when I say alternate electors?

12 A Yeah. I'm aware of what you're talking about.

13 Q What was your first understanding that there was an effort to have  
14 Trump-Pence electors cast votes in contested States?

15 A I don't remember ever having knowledge of that or talking about that in the  
16 post-election period through January 6th. I just don't ever remember that issue from  
17 that period of time. But I've certainly heard about that issue from press accounts and  
18 what you all have been publicly talking about in the last year.

19 [REDACTED] But did you hear about it before the election?

20 Mr. Reed. No, I don't remember ever hearing about it before the election or in  
21 that post-election period. Doesn't mean I didn't. I really don't remember ever hearing  
22 that in that period. But I certainly have heard about it in the past 6 months or year or  
23 whatever it's been since the press has been talking about it.

24 [REDACTED] So is it fair to say you heard about the concept of an alternate elector  
25 sometime after January 6th, 2021?

1           Mr. Reed. To the best of my recollection, yes. Again, this is a year and a half  
2 ago. I could have had a conversation about it in that 3-month, 4-month period. I could  
3 have heard about it from a media report or someone. I just don't remember.

4           BY [REDACTED]

5           Q     Did you have any discussions with Ronna McDaniel regarding the RNC's  
6 involvement in this alternate elector endeavor?

7           A     Certainly -- I don't remember ever having a conversation with her about it in  
8 the pre-election period.

9           In the post-election period, I think since it's been in the news the last six months  
10 or a year, and since there's been some RNC committee members who I think were a part  
11 of that, I probably have -- I've had a conversation with her about it in that period. We've  
12 been talking about it publicly for the past 6 months. When I say "we," I mean you guys  
13 and the country.

14           So, yeah. But not before that, I don't think, not that I can remember.

15           Q     So -- and to put a fine point on it -- you don't have any either knowledge or  
16 involvement in coordinating with electors in the lead-up to January 6th. Is that right?

17           A     I don't have any knowledge or recollection of that.

18           Q     Okay. Give me one second, Todd, will you, please?

19           All right. Mr. Reed, I want to go to the day of January 6th. Where were you  
20 that day?

21           A     I believe I was -- I was in Amelia Island, Florida. We had our RNC winter  
22 meeting in Amelia Island outside of Jacksonville. I can't remember exactly which day I  
23 got there. I think it probably would have been Tuesday of that week, possibly Monday  
24 actually. I was there all week. I was there till Friday. I forgot which day of the week  
25 was January 6th.

1           Q     And when did you first hear about the violence at the Capitol?

2           Let me ask you this. First, did you watch President Trump's speech while it was  
3     happening that day?

4           A     I don't believe I did because we were at a conference with all of our  
5     committee members at a hotel on Amelia Island, and I don't think there were a lot of TVs  
6     around. I don't remember seeing his speech that day.

7           I remember first hearing about the violence that day. There was a bomb placed  
8     at the RNC that morning. And so that was when -- I think that was the first time I really  
9     became attuned to it. A reporter called me -- well, I heard about it from our security  
10    team, of course, from our chief of staff, and then a reporter called me shortly thereafter  
11    to confirm it. So that was sort of where I started paying attention obviously to what was  
12    going on.

13           BY [REDACTED]

14           Q     Do you happen to remember what time of day you or the RNC leadership  
15    became aware of the bomb report?

16           A     I think it was mid-morning. But I, like -- I don't remember that. I don't  
17    want to, like -- I think that's what it was to the best of my recollection. But I could be  
18    wrong.

19           Q     To the extent that you remember, it was before you learned of the violence  
20    that was happening at the Capitol?

21           A     Yeah, I think that makes sense, because from my memory -- you guys  
22    probably know the timeline better than I do -- but I believe the violence at the Capitol  
23    started in the afternoon if I'm not mistaken. I think the bomb scare was in the morning.  
24    That's my recollection.

25           Q     And do you remember where you were or what you were doing when you

1 learned about the violence that was happening at the Capitol?

2 A I don't -- I mean, I know I was at the hotel on Amelia Island. Probably just  
3 heard about it on Twitter. Because I remember there weren't a lot of TVs around that  
4 day. It wasn't till that evening that I really was watching TV. I'm always scrolling  
5 through Twitter, so I'm sure I was following on Twitter that afternoon.

6 Q I understand that may have been after the fact, and it sounds like you may  
7 have been learning about it after the events had already occurred. But do you  
8 remember what your reaction was when you were reading about the events that had  
9 transpired that day?

10 A Well, we were obviously very -- obviously horrified by the violence that  
11 occurred. Violence is never okay in politics. So I was upset about it as everyone was.

12 I actually remember my wife -- we live on Capitol Hill, so my wife -- we have two  
13 boys. I can't remember if we had two at that point or it was one. Maybe we just had  
14 one at that point. Oh, no, we had two. Make sure I get that right. My second child  
15 was 5 months old.

16 She fled. She, like, put the kids in the car and went to my parents' house in  
17 Ashburn, Virginia, because she was scared that day.

18 So, yeah, I was horrified by it, by the violence.

19 Q After the fact, understanding that you learned about it later that day, I'm  
20 assuming at some point you may have become familiar with the timeline of what  
21 happened that day in terms of when the violence started, what the President's reaction  
22 was -- or his lack of reaction -- and then how things were resolved.

23 Do you remember at some point becoming familiar with the timeline of events of  
24 what occurred that day?

25 A Sorry. Ask that again.

1           Q     So I'm dividing the two. One is becoming aware of the violence, of what  
2     was happening, but understanding that you weren't watching at the time in real time.

3           At some point did you become familiar with the timeline of events of what  
4     happened that day in terms of when the violence started, what the President did or didn't  
5     do, when the violence ended?

6           At some point, did you become familiar with that timeline?

7           A     Yeah, I'm sure I did. I, obviously, follow the news closely. So yeah, I  
8     became aware of the timeline, yes.

9           Q     And do you remember having any personal feelings or discussions with  
10    others at the RNC with regard to how the President conducted himself that day in  
11    response to the violence?

12          A     Yeah, I'm sure I had those conversations, but I just can't remember with any  
13    specificity. I mean, we were as a body down there, we were -- the whole RNC, all of our  
14    committee was together. So we were just focused on the violence and how concerning  
15    that was. And there was a bomb placed at the RNC that morning. So we were all very  
16    upset by the violence that day.

17          Q     No, and I totally understand that point, and I can imagine that the  
18    conversation was obviously largely focused on the bomb threat because that would, I  
19    would assume, take precedence.

20          But at some point sitting here today, my question is, as the Republican National  
21    Committee and the impact and the import of the event, was there any discussions about  
22    how the President handled or failed to handle the violence that day amongst the RNC  
23    leadership?

24          A     I just don't remember any -- I don't remember, like, specific conversations  
25    about that. I'm sure -- I take your -- I mean, I'm pretty sure we did talk about it, but I

1 just couldn't remember with any specificity different opinions on that front.

2 We were mostly focused on the bomb threat at our building and the violence that  
3 had occurred that day. I don't think we knew enough. We were very insulated at that  
4 week doing our meeting.

5 And so I don't think we really were -- knew enough. We were just focused on the  
6 fact that violence is bad and the bomb at the building is terrible. We publicly  
7 condemned that. I remember that being a point of conversation about making sure that  
8 we put a statement together and tweets and whatnot.

9 Q That publicly condemned the violence?

10 A Yeah. I remember, I think, putting a statement together that day that went  
11 out publicly condemning the violence, obviously.

12 Q And I think I remember it was either Ms. McDaniel maybe tweeted or there  
13 was an article. I remember I believe it came from Ms. McDaniel.

14 And I guess my question is, understanding that you guys were in Georgia, you're  
15 having these conversations, was there a general vibe, to the best that you can remember,  
16 to the extent of what was the reaction, to the extent anyone had one?

17 When you were all down there after the discussion about the bomb, you just had  
18 the incident of January 6th, do you remember even feelings, emotions, just in terms of do  
19 you remember anyone in the RNC group discussing or evaluating the President's actions  
20 that day?

21 A I just remember being focused on the violence of that day. I don't  
22 remember us going through and -- I'm not sure which actions you're referring to. But I  
23 just remember us being -- as everyone was -- just appalled by violence. Violence is  
24 never good when you're attacking police officers and people are breaking windows and  
25 causing destruction. We were -- everyone was horrified by that.

1 Q And now getting away from the day of January 6th and immediately after,  
2 understanding you put out the statement about the violence, do you remember having  
3 any conversations with folks at the RNC about when the messaging should switch from  
4 abhorring the violence to it being a legitimate protest?

5                   Or were there ever any conversations in terms of when to change the messaging  
6                   about January 6th?

7                   A     I'm not sure which change of messaging you're referring to.   But I think  
8     we've always -- I think we've -- I'm pretty sure we've been consistent in stating that  
9     peaceful protests are okay.   And we've separated the violence from that day from any  
10    peaceful protest that occurred that day obviously.

11 [REDACTED] I think what my colleague is referencing is -- I think the  
12 quote is, quote, "persecution of ordinary citizens engaged in legitimate political  
13 discourse," and I think around that messaging there, which seems in contrast to what you  
14 were saying was the sense on the 6th itself.

15                   Mr. Reed. I'm sorry. You just said -- what line did you just say and where is that  
16                   from?

17 Mr. Steggerda. The source of the question is the RNC --

18 Mr. Reed. You're talking about the resolution?

19 Mr. Steggerda. The resolution --

20 Mr. Reed. Okay. Is that what we're talking about now?

21  Exactly.

22                   Mr. Reed. So that resolution -- the language in that resolution -- I could talk for a  
23                   while about this -- the language in that resolution, that line was referring to people that  
24                   were not at the Capitol that day. Every reporter that was there on site at our winter  
25                   meeting in Salt Lake City recognized that. That was a conversation that was happening

1 at that meeting, was that we were concerned -- that we were -- people were upset  
2 that -- and now we're talking about the contingent elector issue -- that certain RNC  
3 members had received subpoenas from you all on this issue.

4 And in the opinion of many -- and resolutions come from committee members, to  
5 be clear, not from RNC staff -- but just talking generally what the discussion was that  
6 week in Salt Lake was that people were upset that folks that were found out to be  
7 contingent electors that had nothing to do with violence that day on January 6th, that  
8 were just signing up to be contingent electors, in my understanding to be there in case  
9 the legal challenges were successful, that they were being kind of being wrapped into  
10 that, wrapped into the violence.

11 So that's where that line comes from, is "legitimate political discourse" was  
12 referring to people that were peacefully protesting or a part of a process like those  
13 contingent electors.

14 Q Well, to be clear, the resolution says, "Whereas Representatives Cheney and  
15 Kinzinger are participating in the Democrat-led persecution of ordinary citizens engaged  
16 in legitimate political discourse." That's a quote from the resolution itself.

17 And it sounds like that's inconsistent with the characterization you were giving  
18 that there was an immediate response on the 6th while you were all together.

19 Would you say that's not inconsistent?

20 A Well, I'm just saying that's a totally separate issue. I mean, I think that  
21 resolution -- I mean, the statements that went out on January 6th and post-January 6th  
22 condemning the violence, that was a year prior to that resolution.

23 That resolution was being done because -- and then I'm speaking for the members  
24 again -- but resolutions are put together by RNC committee members, 168 committee  
25 members, not RNC staff.

1           But just allow me to speak for them for a second. I know, because I was in Salt  
2       Lake in part of these -- in the room for these conversations, that that resolution was put  
3       together because they feel that -- sorry, but your committee is going too far in terms of  
4       not just investigating folks that were violent at the Capitol that day, but going beyond  
5       that in investigating people that were just part of the peaceful process.

6           Like, one example, being -- one specifically was concern over our  
7       committeewoman from Michigan who signed on to be a contingent elector was one that  
8       people were talking about that day -- or that week.

1 [1:58 p.m.]

2 BY [REDACTED]

3 Q Mr. Reed, where does it say that in the resolution? Where does all the  
4 nuance that you just provided, the exploratory description, where does it say that in the  
5 resolution that describes the people of January 6th as legitimate political discourse?  
6 We're really just talking about not so much the people attacking in the Capitol, but really  
7 talking about this separate other smaller group?

8 A Every -- there were 40 reporters in Salt Lake that were tracking this issue,  
9 this resolution, as there were edits made of the resolution and the resolution made it to  
10 the process. Every single one of the reporters in Salt Lake understood that line to mean  
11 what I was just describing.

12 The New York Times took that line out of context, and that's what blew this up  
13 into a press issue. I'm just telling you that that line was referring -- just because I was in  
14 the room and heard these conversations, I know that that line was not referring to people  
15 that were violent at the Capitol that day. That would be totally inconsistent with  
16 anything that the RNC has ever -- both staff and the RNC members.

17 The statement that we put out, I believe, on the evening of January 6th, that's  
18 just -- that's not what that line meant. It was not referring to people that were being  
19 violent at the Capitol.

20 Q No, I understand that. I mean, I -- I guess there's a difficult question in the  
21 sense of when we're going over all of these fundraising emails and we're talking about  
22 things, I'm wondering if, you know -- there's words that matter that are in emails, that are  
23 in resolutions, and if you have to provide a lot of context outside of the words to explain  
24 them, to make them accurate, to make them true, to make them more -- less  
25 inflammatory, from a communications perspective, I'm wondering, is that effective

1 communication if the words themselves don't convey -- if they require a lot of additional  
2 context and a lot of additional explanation, is there a problem with that from an effective  
3 communications standpoint?

4 A I just totally reject the premise of that. I'm sorry. I mean, every reporter  
5 that was there understood what that line meant. It was part of the conversation --

6 Q No. I'm sorry. I'm lumping in the resolution. I was really talking about  
7 the fundraising emails where earlier when we were talking, you provided a lot of nuance,  
8 a lot of explanation, a lot of stuff about election integrity, and that's just not what those  
9 emails say.

10 And so, my question is, in terms of the millions of people who are reading these  
11 fundraising emails, who are just taking what those fundraising emails say at face value,  
12 did anybody ever have any communications or discussions about the effect of those  
13 communications by people just reading them, without nuance, without further  
14 explanation, without further description, just reading them, what the impact those emails  
15 would have on people? Was there any discussion of that ever?

16 A I don't remember ever having a discussion about that. And I just,  
17 obviously, reject the premise that in an email like the couple of ones that we have gone  
18 over would cause someone to be violent. But that's just my opinion. But we -- I don't  
19 recall having questions -- discussing that issue that you just brought up.

20 Q Earlier --

21 Mr. Steggerda. Amanda -- oh, I'm sorry. I just wanted to note the time. And I  
22 want you all to finish, but it's a little after 2:00.

23 [REDACTED] Yeah, I think we're --

24 Mr. Steggerda. I told the folks -- I've got a -- I can go in a little late. I'm just -- I  
25 just don't want to go too much farther if you guys are close, if possible.

1                            [REDACTED] I think we actually are. I do -- we were cognizant of the stop. And  
2    apologies, I don't think I was aware -- we have this until at least 3:00. I don't -- I think I  
3    saw your email this morning, so we were trying to adjust, but we weren't aware of the  
4    hard stop until pretty late.

5                            Mr. Steggerda. Yes, my fault.

6                            [REDACTED] No. That's okay. And you know we try to respect that where we  
7    can, so we are trying to be efficient with our time.

8                            BY [REDACTED]

9                            Q    I guess I wanted to go back to something that you said earlier, Mr. Reed,  
10   which was something along the lines of you could never be sure if there was, in fact,  
11   fraud. Did I mischaracterize what you said earlier when we were talking about the 2020  
12   election?

13                          A    Yeah. Yeah, I think you are. I don't remember -- I'm sorry, I don't  
14   remember what that was in reference to, what the context was.

15                          Mr. Steggerda. [REDACTED] I hate to intrude.

16                          The record has got to be clear on this. Do you believe that there was fraud in the  
17   election?

18                          Mr. Reed. I believe -- yeah, I believe -- yeah, there absolutely was some fraud in  
19   the election. I believe that the way laws were changed in the lead-up to the election  
20   with going from extremely low amounts of absentee balloting, taking away all of the  
21   safeguards in the ballot in some States, whether it be signature match or voter ID  
22   requirements or witness requirements or the date ballots are supposed to arrive by, I  
23   think it allowed for a chaotic process.

24                          Mr. Steggerda. The second question was, do you believe that there was a  
25   dispositive amount of fraud?

1           Mr. Reed. I think we'll never know the -- we'll never know the answer to that.  
2   There was certainly some fraud. I think we'll never know whether -- how much there  
3   was or if the election was conducted in a way without -- you know, with COVID never  
4   happening and safeguards in place on the ballot with some absentee voting if it would  
5   have been a different outcome. I just don't know.

6           BY [REDACTED]

7           Q    Yeah. So that's the part that I kind of want to pick apart really quickly  
8   because, to Mr. Steggerda's point, there is always -- we would never ask you the question  
9   whether there's fraud in the election because there's always some amount of fraud in an  
10   election. There's always individuals who -- some small -- I forget the name of the  
11   organization, but somebody did an 80-year study I think over the history of election fraud,  
12   and there's always some relatively de minimus non-dispositive amount of election fraud.  
13   So that's -- we're not going to ask you a trick question. There's always election fraud.

14           But what we really do want to get to is the point that you were saying just a  
15   moment ago where you said, Well, we'll never be able to know whether there was, in  
16   fact, fraud in the 2020 election from certain things. And you started to identify a  
17   number of the laws that were changed, and my question is, if a State changes their laws  
18   and says, okay, now you can vote in a certain way, there is actual voter fraud where an  
19   individual who's not able to vote legally votes in a fraudulent way. There's somebody  
20   voting under a different name. There's people voting in multiple places. These are  
21   traditionally how we categorize election fraud.

22           Would you agree?

23           A    Yeah. I know where you're going with the question, and what I would say is  
24   that the way that the laws were changed, our concern is that that allowed for a higher  
25   degree of fraud. I mean, if you're making it into --

1           Q    I hear you.

2           What kind of fraud?  Because those things are measurable, right?  The fear of  
3    dead people voting, you can investigate whether dead people voted.  Would you agree  
4    with that?

5           A    Yeah, you can certainly investigate it.  Again, you may never know -- yes, I  
6    guess I would agree with that, that you would never know for sure.  But you can  
7    certainly investigate it, sure.

8           Q    And if you allow -- if you take off signature matching and more people vote,  
9    you can, in fact, investigate whether those people legally had the right to vote and legally  
10   voted, correct?

11          A    If you take off signature matching -- sorry.  Say it again?

12          Q    What I'm trying to figure out is earlier you said, Well, they changed all of  
13    these laws, and they opened the voting, and they made it much easier to vote either  
14    in -- sometimes in person, but also mail-in balloting, right?  But I think you would agree  
15    that mail-in balloting on its face is not fraudulent, correct?

16          A    On its face, what I would say is that if -- mail-in balloting, if you have a  
17    situation where you acquire a mail-in ballot that has a signature on it or in some States a  
18    witness to witness the process of voting, if you take that safeguard away, the signature or  
19    the witness process, or if you mail out ballots to everyone on the voter rolls without then  
20    requesting it, I think it just -- I'm not a lawyer, but from where I come from, my general  
21    understanding, I think you have a much higher chance that we'll never  
22    know how -- there's going to be more fraud, that people are going to vote --

23          Q    Okay.  100 percent --

24          A    That there will be illegal votes counted in the process where they shouldn't  
25    be.

1           Q     Ah, okay.  But illegal on -- you say illegal votes.  But illegal on what  
2 grounds, right?  Because I understand you to say it increases the chances that somebody  
3 could vote illegally.  But there is a way to investigate whether, in fact, people voted  
4 illegally, correct?  Like you understand what legal versus illegal votes are, right?

5           A     Sure, yes.

6           Q     Okay.  So if a vote is legal versus illegal, you understand the concept of  
7 investigating allegations of voter fraud?

8           A     I understand that concept, yes.

9           Q     So when investigations of voter fraud are conducted and a U.S. Attorney or  
10 the Attorney General himself says there's no evidence that, in fact, there was voter fraud  
11 of any dispositive amount in that situation, those ballots, in fact, came out from under a  
12 table, those ballots in the trash were never used, when dispositive evidence comes out  
13 that says there's no actual basis to those claims, is it your position that there still could be  
14 fraud so there's fraud, or that evidence doesn't matter?  I'm trying to figure out, how  
15 does the answer be we can never know, even after investigations into allegations of voter  
16 fraud whether there was, in fact, voter fraud?

17           A     So I guess what I would say is that -- and I guess this is a little bit different  
18 from where I sit now versus the post-election period.  At this point, you know, I accept  
19 that Joe Biden, you know, is the President, won the election under the rules that were  
20 played.  I accept it, that the legal challenges were sought after by both the RNC and the  
21 Trump campaign and those legal challenges eventually failed and the election was  
22 certified by Congress.  So I accept it, that he won the election and is the President under  
23 that process.  And I'm, obviously, focused on the next election.

24           But I -- so, at the time, in the post-election period -- and I certainly had concerns  
25 about the way the election was conducted and concerns that there was significant -- that

1 there was a high degree of fraud, whether by people stuffing ballot boxes, or whatever,  
2 stuff we talked about earlier, or election administrators not properly conducting the  
3 process of counting the votes and allowing the votes to be counted that would have been  
4 against the law, whether it be after a certain date or maybe without signature, or  
5 whatever, maybe, I had those concerns. I have them now. But I accept, you know,  
6 under the rule of law and the process that we have in this country that there was an  
7 election, there was a period of a month, 2 months of where the campaign was allowed to  
8 seek challenges to that process. It was then certified by Congress, and I accept that.

9 I don't know if that answers your question, but --

10 Q The explanation is incredibly helpful, and I do appreciate it. And I  
11 understand the distinction between having concerns of voter fraud at the time, and then  
12 later accepting the results of entities that said, Okay, the President is certified.

13 What I'm trying to find out is, do you accept the agencies and organizations that  
14 investigated and said there was no statistically significant election fraud? Those changes  
15 in the statutes did not, in fact, lead to increased voter fraud, that there was not voter  
16 fraud, that it was a fair and honest election factually in terms of the voter fraud, that  
17 there wasn't more than the normal amount of voter fraud in the election, that we can, in  
18 fact, investigate allegations of voter fraud and know whether there was or was not voter  
19 fraud. Is that something that you accept?

20 A Um, I have respect for the former Attorney General and those entities. I  
21 would just say I'm not a lawyer. I'm not an election lawyer. What I would say from my  
22 personal perspective is that I certainly -- I just feel like if you're going from very small  
23 amounts of mail-in voting and you're then in the course of 5 months putting in a process  
24 where you're going to an extremely high amount of mail-in voting in a State, that there's  
25 going to be problems with that. I still have concerns about that today. That's just my

1 personal opinion.

2 So I find it hard to believe that, like, this election was all hunky-dory and there was  
3 the same amount of fraud as every other election. I just find that hard to believe  
4 personally from my personal perspective.

5 But, again, I would say what I said earlier. I accept that there was a process in  
6 place. That process was exhausted, that the election was certified, and I accept it, you  
7 know, under -- I respect the rule of law, and I certainly have accepted that he won under  
8 the process, and I've moved on.

9 Q That's very helpful.

10 And I guess my last question is, to the extent that you can -- and I understand this  
11 may seem like an odd question. But if you can take yourself out for a moment and just  
12 put your hat on, pretend you're an apolitical person who's just an American, and you're  
13 sitting here, and I'm asking you the question, can you ever know whether there was, in  
14 fact, a statistically significant amount of voter fraud that would have had a dispositive  
15 effect on the 2020 election? And say you're a citizen sitting here saying, I don't know  
16 the answer to that, I don't know if we can ever, in fact, know whether there was that  
17 amount of fraud. How do you think we can ever have fair and honest elections in the  
18 future that anybody would ever feel certain about if there's never an answer to was  
19 there, in fact, voter fraud that resulted from those changes? How does a republic move  
20 on from that if there's always uncertainty and never an answer?

21 A So just my personal opinion there is that I think we would be better served  
22 as a country if we had more -- if we pushed for more in-person voting, pushed for proper  
23 paper trails, and whatnot, safeguards on the process, pushed for more observing of the  
24 process, better rules around ensuring that both parties can have observation of all points  
25 of the process. I think that there are certainly things around that that we could do as a

1       country that would make it so that both sides of the aisle have more confidence in the  
2       process.

3           I mean, look, this has been an issue for years. I mean, it was an issue when Bush  
4       won in 2000. There are certain individuals that still think that that election was stolen  
5       from Al Gore. Hillary Clinton still thinks, you know, that the Russians may have played  
6       some aspect of switching the count in 2016. And so, yeah, I mean, both sides of the  
7       aisle have had concerns with the process. We certainly have concerns with the way this  
8       election was conducted, and I do hope it gets better, just from a personal perspective.

9           Q     So, Mr. Reed, I think those are all the questions -- I guess there's a question  
10      that we ask everybody, so don't take this personally.

11           Is there anything that you thought we would ask or that we should have asked  
12      that we didn't?

13           A     No, I don't think so. Thank you, though.

14           ██████████ And we do appreciate your time.

15           Todd, I know we went 15 minutes over, but in fairness we're ending 45 minutes  
16      early from our perspective. So we do appreciate your time.

17           And I will say, Mr. Reed, obviously, for some people, this can be a stressful  
18      experience, and naturally under stress there's a tendency to forget or not recollect and  
19      sometimes a day, 2 days, a week from now you might be in the shower and something  
20      pops into your head. You realize you need to change something. You misstated  
21      something. You remember something. Just reach out to Mr. Steggerda. He can get  
22      in touch with us. We totally understand that that can happen. It's just if something  
23      comes back to you, just let us know, and we're happy to reopen the conversation.

24           As Mr. Steggerda said, this was voluntary, so please don't hesitate to keep that  
25      open if you think of something else or you think of something that you maybe want to

1 clarify that didn't come out the right way.

2 Mr. Reed. Great. I will. Thank you.

3 Mr. Steggerda. Thank you, Amanda. Thank you, Tem. Thank you, Becky.

4 [REDACTED] And thank you to our court reporters.

5 Mr. Reed. Sorry I talked fast.

6 [Whereupon, at 2:17 p.m., the interview was concluded.]

1 Certificate of Deponent/Interviewee

2

3

4 I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the  
5 answers made by me to the questions therein recorded.

6

7

8

9

10 Witness Name

11

12

13

14

Witness Name

15

Date